

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of a Warrant for Content
and Other Information Associated with
the [REDACTED]

23 MAG 370

SEARCH WARRANT AND NON-DISCLOSURE ORDER

TO: Apple Inc. (“Provider”)

Federal Bureau of Investigation (“Investigative Agency”)

1. Warrant. Upon an affidavit of Special Agent Mary Jo Corkery of the Federal Bureau of Investigation, and pursuant to the provisions of the Stored Communications Act, 18 U.S.C. § 2703(b)(1)(A) and § 2703(c)(1)(A), and the relevant provisions of Federal Rule of Criminal Procedure 41, the Court hereby finds there is probable cause to believe the [REDACTED]

[REDACTED], maintained at premises controlled by the Provider, contains evidence, fruits, and/or instrumentalities of crime, all as specified in Attachment A hereto. Accordingly, the Provider is hereby directed to provide to the Investigative Agency, within 14 days of the date of service of this Warrant and Order, the records specified in Section II of Attachment A hereto, for subsequent review by law enforcement personnel as authorized in Section III of Attachment A. The Government is required to serve a copy of this Warrant and Order on the Provider within 14 days of the date of issuance. The Warrant and Order may be served via electronic transmission or any other means through which the Provider is capable of accepting service.

2. Non-Disclosure Order. Pursuant to 18 U.S.C. § 2705(b), the Court finds that there is reason to believe that notification of the existence of this warrant will result in destruction of or tampering with evidence, flight from prosecution, and/or intimidation of potential witnesses, or otherwise will seriously jeopardize an ongoing investigation. Accordingly, it is hereby ordered that the Provider shall not disclose the existence of this Warrant and Order to the listed subscriber or to any other person for a period of one year from the date of this Order, subject to extension upon application to the Court if necessary, except that Provider may disclose this Warrant and Order to an attorney for Provider for the purpose of receiving legal advice.

3. Sealing. It is further ordered that this Warrant and Order, and the Affidavit upon which it was issued, be filed under seal, except that the Government may without further order of this Court serve the Warrant and Order on the Provider; provide copies of the Affidavit or Warrant and Order as need be to personnel assisting the Government in the investigation and prosecution of this matter; and disclose these materials as necessary to comply with discovery and disclosure obligations in any prosecutions related to this matter.

Dated: New York, New York

1/17/23
Date Issued

3:14 pm
Time Issued



HON. BARBARA MOSES
UNITED STATES MAGISTRATE JUDGE
Southern District of New York

Search Attachment A

I. Subject Account and Execution of Warrant

This warrant is directed to Apple Inc. (the “Provider”), headquartered at 1 Infinite Loop, Cupertino, California 95014, and applies to all content and other information within the Provider’s possession, custody, or control associated with the [REDACTED]

[REDACTED]

A law enforcement officer will serve this warrant by transmitting it via email or another appropriate manner to the Provider. The Provider is directed to produce to the law enforcement officer an electronic copy of the information specified in Section II below. Upon receipt of the production, law enforcement personnel will review the information for items falling within the categories specified in Section III below.

Information to be Produced by the Provider

To the extent within the possession, custody, or control of the Provider, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to the Provider, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f) (including the request with reference number 202200121131), the Provider is directed to produce the following information associated with the Subject Account:

a. All records or other information regarding the identification of the account, including full name, physical address, telephone numbers, email addresses (including primary, alternate, rescue, and notification email addresses, and verification information for each email address), the date on which the account was created, the length of service, the IP address used to register the account, account status, associated devices, methods of connecting, and means and source of payment (including any credit or bank account numbers);

b. All records or other information regarding the devices associated with, or used in connection with, the account (including all current and past trusted or authorized iOS devices and computers, and any devices used to access Apple services), including serial numbers, Unique Device Identifiers (“UDID”), Advertising Identifiers (“IDFA”), Global Unique Identifiers (“GUID”), Media Access Control (“MAC”) addresses, Integrated Circuit Card ID numbers (“ICCID”), Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifiers (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Numbers (“MSISDN”), International Mobile Subscriber Identities (“IMSI”), and International Mobile Station Equipment Identities (“IMEI”);

c. The contents of all emails associated with the account, including stored or preserved copies of emails sent to and from the account (including all draft emails and deleted emails), the source and destination addresses associated with each email, the date and time at which each email was sent, the size and length of each email, and the true and accurate header information including the actual IP addresses of the sender and the recipient of the emails, and all attachments;

d. The contents of all instant messages associated with the account, including stored or preserved copies of instant messages (including iMessages, SMS messages, and MMS messages) sent to and from the account (including all draft and deleted messages), the source and destination account or phone number associated with each instant message, the date and time at which each instant message was sent, the size and length of each instant message, the actual IP addresses of the sender and the recipient of each instant message, and the media, if any, attached to each instant message;

e. The contents of all files and other records stored on iCloud, including all iOS device backups, all Apple and third-party app data, all files and other records related to iCloud Mail, iCloud Photo Sharing, My Photo Stream, iCloud Photo Library, iCloud Drive, iWork (including Pages, Numbers, Keynote, and Notes), iCloud Tabs and bookmarks, and iCloud Keychain, and all address books, contact and buddy lists, notes, reminders, calendar entries, images, videos, voicemails, device settings, and bookmarks;

f. All activity, connection, and transactional logs for the account (with associated IP addresses including source port numbers), including FaceTime call invitation logs, messaging and query logs (including iMessage, SMS, and MMS messages), mail logs, iCloud logs, iTunes Store and App Store logs (including purchases, downloads, and updates of Apple and third-party apps), My Apple ID and iForgot logs, sign-on logs for all Apple services, Game Center logs, Find My iPhone and Find My Friends logs, logs associated with web-based access of Apple services (including all associated identifiers), and logs associated with iOS device purchase, activation, and upgrades;

g. All records and information regarding locations where the account or devices associated with the account were accessed, including all data stored in connection with Location Services, Find My iPhone, Find My Friends, and Apple Maps;

h. All records pertaining to the types of service used;

i. All records pertaining to communications between Apple and any person regarding the account, including contacts with support services and records of actions taken; and

j. All files, keys, or other information necessary to decrypt any data produced in an encrypted form, when available to Apple (including, but not limited to, the keybag.txt and fileinfolist.txt files).

III. Review of Information by the Government

Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, interpreters, and vendors outside technical experts under government control) are authorized to review the records produced by the Provider in order to locate any evidence, fruits, and/or instrumentalities of (i) 18 U.S.C. §§ 201 and 371 (bribing or offering to bribe or demanding or accepting a bribe, and conspiring to do the same); (ii) 18 U.S.C. §§ 1343, 1346, and 1349 (wire fraud and honest services wire fraud, and conspiring to commit wire fraud and honest services wire fraud); (iii) 18 U.S.C. § 1951 (extortion under color of right and conspiring to do the same); (iv) 18 U.S.C. §§ 1956 and 1957 (money laundering, engaging in a financial transaction in criminally-derived property, and conspiracy to do one or both of the same); (v) 18 U.S.C. §§ 1001 and 371 (making false statements and conspiring to do the same); and (vi) 18 U.S.C. §§ 1503, 1512, and 371 (obstruction of justice and conspiring to do the same) (collectively, the “Subject Offenses”), including the following:

- Communications between or involving one or more of
- Communications, photographs, or other documents or records concerning any communication between

- Communications, photographs, or other documents or records concerning a New Jersey state criminal case or investigation of or involving including communications with or regarding the New Jersey Attorney General's Office, the New Jersey Division of Criminal Justice, any attorney for or any person acting at Menendez's direction to resolve that case or investigation or otherwise assist
- Communications, photographs, or other documents or records concerning any communication between , or persons acting on their behalf and any person regarding the administration of COVID-19 testing in New Jersey or any city, county, municipality or other subdivision of New Jersey;
- Communications, photographs, or other documents or records concerning any acts performed or requested to be performed by Menendez, or by Arslanian or anyone else acting on behalf of or purporting to be acting in concert with Menendez—for the benefit of or of any persons acting on their behalf;
- Communications, photographs, or other documents or records concerning any gifts, services, and/or money offered or provided to Arslanian and/or to Menendez by or persons acting on their behalf, and/or receipt or solicitation of the same; or concerning the location of any such gifts, services and/or money, or concerning evidence of such location;
- Communications, photographs, or other documents or records concerning the filing of any and all financial disclosure forms, including but not limited to draft financial disclosures, filed financial disclosures, documents used in the preparation of financial disclosures, and correspondence with any person regarding the preparation of financial disclosures;
- Communications, photographs, or other documents or records concerning search warrants executed on or about November 25, 2019, and on or about June 16, 2022, including communications concerning a federal investigation involving Menendez, Hana,
- Communications, photographs, or other documents or records concerning the use of alternative methods of communications believed to be less easily accessed or intercepted by law enforcement;
- Communications, photographs, documents, records, or other media evidencing the background and nature of the relationship between Menendez, Hana, Arslanian, Uribe,

- Information, including geolocation information, concerning the timing or location of communications or actions in furtherance of one or more of the Subject Offenses (e.g., information that places Hana, Uribe,
- Information concerning the identity of the user(s) of the Subject Account at times relevant to one or more of the Subject Offenses;
- Information concerning the identities and locations of co-conspirators (including, for example, communications with co-conspirators, photos or other attachments, and address book information); and
- Information concerning passwords or other information needed to access a user's computer, electronic devices or other online accounts used in furtherance of one or more of the Subject Offenses.

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II. Probable Cause

A. Probable Cause Regarding the Subject Offenses

14. As set forth below, the Subject Offenses relate to a suspected scheme by several individuals to provide things of value to Nadine Arslanian, a/k/a Nadine Menendez (“Arslanian”), the now wife of U.S. Senator Robert Menendez,¹ in exchange for Menendez’s influence attempting to secure a favorable resolution of a New Jersey state criminal prosecution then pending against one of the individuals and a state criminal investigation then pending against another, as well as his influence in obtaining municipal COVID-19 testing contracts and/or other authorization to a company owned by one of the bribe-payors, and in exchange for Menendez taking other official acts as well.²

17. was at all relevant times a businessman associated with the company and as set forth in paragraph 30 below, was prosecuted by the State of New Jersey for workers’ compensation insurance fraud related to this company. In addition, at all relevant

¹ As set forth below, the things of value were provided both before and after Arslanian married Menendez. Because the majority of the events recounted herein took place before Arslanian married Menendez and changed her name to Nadine Menendez, she is referred to as “Arslanian” herein.

² The facts set forth herein are drawn from case documents and information known to law enforcement agents and other government personnel involved in the investigation, of which I have knowledge based on my review of materials and discussions with those involved in the investigation.

times, was also associated with the company

, for which he has been listed on the company's website as its President.

23. is a business associate of Uribe who, as discussed in paragraphs 54.y, 54.z, and 61, was involved in Uribe's making payments on the loan for the Mercedes-Benz Automobile.

24. s the owner and CEO of a biomedical testing company. As set forth in paragraphs 67-68, apparently worked with (an individual described in the next paragraph below) in 2020 and 2021 to have pay tens of thousands of dollars to Arslanian and the Arslanian Company, apparently in exchange for Menendez using his influence to secure for contracts and/or other authorization with various New Jersey municipalities to perform COVID-19 testing.

25. [REDACTED] was at relevant time periods a business associate of both Hana and [REDACTED]. As set forth below, [REDACTED] appears to have provided carpeting, home improvement services, and tangible gifts to Arslanian and Menendez; in August 2019, [REDACTED] described aspects of the bribery scheme to a confidential source (the “CS”) in a recorded conversation; and [REDACTED] received funds from [REDACTED] and apparently was involved in making certain of [REDACTED] payments to the Arslanian Company.

31. Based on my conversations with other law enforcement personnel and my review of law enforcement reports, I have learned that in or about August 2019, *i.e.*, shortly after the plea and sentencing described above,⁶ the CS met with _____ and the following conversation, which was consensually recorded by the CS at the direction of law enforcement, occurred, in substance and in part:

a. _____ told the CS that Hana arranged for Arslanian to receive a ring and a Mercedes-Benz automobile in exchange for Menendez's assistance in resolving criminal charges for insurance fraud pending against an American male.⁷

⁶ It appears, based on the investigation, that _____ and Hana had a financial dispute prior to this conversation.

⁷ These communications took place mainly in Arabic, and the description of them is based on a review of a draft summary and translation, subject to revision.

b. discussed how the criminal case “needed a push,” and “without” the push the man “would have gotten three years imprisonment,” but the “push made the man avoid the three years.”

c. further told the CS that the American male gave Hana \$150,000 and that Hana then purchased the engagement ring for Menendez’s girlfriend, along with a car, and kept the remaining money for himself. As detailed further below, I understand that the “American male” is a reference to and the reference to Menendez’s girlfriend is a reference to Arslanian.⁸

⁸ Based on my conversations with other law enforcement personnel and my review of interview notes and an FBI report, I am aware that was interviewed by the FBI on June 16, 2022, and claimed, among other things, not to be aware of Hana having provided a ring or car to Arslanian, and not to be aware of Hana attempting to assist with his criminal case. As noted in footnote 52, below, Arslanian sent text messages indicating that Menendez planned to exchange an engagement ring Menendez owned for a new engagement ring to give to Arslanian, and a jeweler who provided an engagement ring to Arslanian stated that he did so in exchange for an engagement ring.

- i. The contents of the First Uribe Email Account and the Email Account reveal that both Uribe and are affiliated with multiple companies related to the trucking industry. The First Uribe Email Account's email

address is [REDACTED], and is used, among other things, to conduct the business of [REDACTED], a trucking company. The First Uribe Email Account also contains numerous communications between Uribe and [REDACTED] regarding trucking insurance for which [REDACTED], a company [REDACTED] appears to be employed by, apparently serves as an insurance broker servicing the trucking industry. The contents of the Uribe iCloud Account show Uribe repeatedly directing [REDACTED] to provide insurance certificates for [REDACTED] to third parties. As set forth below, I believe that Uribe is also affiliated with trucking companies [REDACTED] (see paragraph 61.i) and [REDACTED] (see paragraph 61.d.i).¹²

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52. On or about June 22, 2022, I participated in an interview of _____ who stated, among other things, in substance and in part:

a. Prior to the COVID-19 pandemic, Menendez called the _____ and asked _____ to meet Menendez in Menendez's office in Newark, New Jersey, to which _____ agreed.

b. During this meeting, which _____ attended with a senior staffer from the New Jersey Attorney General's Office (the "Senior NJAG Staffer"), Menendez claimed that a constituent of his was being prosecuted by New Jersey authorities for insurance fraud in what Menendez claimed was an allegedly selective prosecution.³⁵

c. Menendez stated that this constituent's defense attorney was _____ . Based on my participation in the investigation and the interview with _____ , as well as my review of the materials cited above indicating that _____ was represented by _____ , I believe the constituent Menendez claimed was being selectively prosecuted by New Jersey authorities was _____ .

³⁵ I am aware based on my conversations with other law enforcement personnel that representatives of the New Jersey Attorney General's office were unable to locate any calendar entries for _____ reflecting a meeting with Menendez in early 2019. However, as noted in paragraph 61.m.i, below, _____ calendar reflects a meeting with Menendez on September 6, 2019—*i.e.*, after the resolution of _____ criminal prosecution but several weeks after the request for an interview of _____ in connection with an ongoing criminal investigation described in paragraph 61.a, below.

d. [REDACTED] thought it was highly inappropriate for Menendez to talk to him about a criminal case brought by his office, and [REDACTED] did not communicate with the prosecution team regarding [REDACTED] prosecution.³⁶

53. As set forth below, I understand that following the January 29, 2019 call from Menendez to [REDACTED] described in paragraph 51.o, above, [REDACTED] pled guilty in New Jersey state court to a plea agreement recommending a non-incarceratory sentence and was ultimately sentenced to no jail time, and Arslanian received a series of things of value, including carpeting services by [REDACTED], the Mercedes-Benz Automobile, direct payments to a company she created, and payments to her mortgage company to reinstate her home mortgage.

³⁶ Based on my discussions with other law enforcement personnel and my review of interview notes, I have learned that on June 30, 2022, the Senior NJAG Staffer was interviewed by the FBI, and stated that he remembered that at the meeting, in addition to raising two policy matters, Menendez asked [REDACTED] to “look into” a criminal case in which the defendant was represented by [REDACTED]. The Senior NJAG Staffer felt this request was unseemly.

59. As set forth below, I have learned that following text conversations between Uribe and Arslanian in which Uribe expressed concern apparently about the investigation, Menendez made a second call to in September 2019, and that in late October 2019, Uribe expressed gratitude to Arslanian and Menendez following apparently good news, and subsequently set up automatic payment for the monthly payments on the Mercedes-Benz Automobile, which payments apparently have continued up through in or about the present.

61. As set forth below, based on my conversations with other law enforcement personnel and my review of Mercedes-Benz Financial Services records, the contents of the Uribe iCloud Account, and non-content information provided by Google, together with information obtained pursuant to grand jury subpoenas, I have learned that on November 9, 2019, Uribe set up automatic payments on the automotive loan for the Mercedes-Benz Automobile and initially used the Email Account to do so before creating a new email account for that purpose.⁶³ Specifically, based on those sources I have learned the following:

⁶³ is a business associate of Uribe, and, as noted in paragraph 48.i.i, above, was identified by Uribe to Mendendez Campaign Advisor-1 as a “friend” who would be attending the July 2018 fundraiser for Menendez.

a. At approximately 8:29 p.m. on November 9, 2019, the [REDACTED] Email Account⁶⁴ was added as a contact account in Mercedes-Benz Financial Services records associated with the loan on the Mercedes-Benz Automobile.

b. At approximately 8:30 p.m. that night—*i.e.*, one minute later—Uribe texted [REDACTED], “Chequea tu email”, which roughly translates from Spanish to “Check your email.” Based on context, and my review of records obtained in the investigation, I believe Uribe was referring to an email that [REDACTED]; would have received at the [REDACTED] Email Account from Mercedes-Benz Financial Services.

c. At approximately 8:32 p.m. that night—*i.e.*, two minutes after sending that text message—the Uribe Cellphone called a phone used by [REDACTED]. The call lasted approximately 14 minutes and 48 seconds.

d. At approximately 8:47 p.m. that night—*i.e.*, approximately when the call between the Uribe Cellphone and [REDACTED] cellphone was ending—the account [REDACTED] (the “Second Uribe Email Account”) was created. The recovery phone number for the Second Uribe Email Account is the number of the Uribe Cellphone.

i. The contents of the First Uribe Email Account show that [REDACTED] is a company that is registered to the name of [REDACTED] (who I believe from information in law enforcement databases to be a relative of Uribe); that [REDACTED] is 90% owned by [REDACTED]; and 10% owned by Jose Uribe; and that Jose Uribe, using the First Uribe Email Account, sends emails on behalf of [REDACTED], and is listed on documents as associated with [REDACTED]. The [REDACTED] Email Account was also copied on multiple pieces of correspondence concerning [REDACTED]. Documents found in the First Uribe Email Account also show that [REDACTED] was created in 2010, suspended by the New Jersey Division of Revenue and Enterprise Services on or about November 16,

⁶⁴ The contents of the First Uribe Email Account include emails attaching documents listing [REDACTED] as a freight carrier.

2013 for failure to file annual reports, and was reinstated on or about September 12, 2019.

e. At approximately 8:50 p.m. that night—*i.e.*, several minutes after the call between the Uribe Cellphone and _____ cellphone ended— _____ texted Uribe, “Ya lo hice”, which roughly translates from Spanish to “I already did”.

f. At approximately 8:52 p.m. that night—*i.e.*, approximately 5 minutes after the Second Uribe Email Account was created—the Second Uribe Email Account was updated as the contact account for the loan on the Mercedes-Benz Automobile, replacing the _____ Email Account.

g. Approximately half an hour later, _____ texted Uribe, “Cuando puedo llamame”, which roughly translates from Spanish to “when you can call me”.

h. Several hours later, Uribe texted _____, “Excelente noticias. Vamos a orar.”, which roughly translates from Spanish to “Excellent news. Let’s pray.”⁶⁵

i. Beginning on or about November 9, 2019, the monthly payments to Mercedes-Benz Financial Services were paid by automated clearing house transfers from a bank account owned by _____. Uribe is one of the two signatories on the _____. Through early June 2022, the _____ had made over \$25,000 in payments toward the Mercedes-Benz Automobile.

j. Documents provided by Mercedes-Benz Financial Services reflect that in or about late June 2022—*i.e.*, after the service of subpoenas on and execution of search warrants regarding, among other individuals, Menendez, Arslanian, and Uribe—Arslanian contacted

⁶⁵ From speaking to other law enforcement personnel and reviewing an FBI report, I know that on June 16, 2022, _____ was interviewed by telephone and denied providing Uribe with his email address to use to purchase or make payments on any vehicle.

Mercedes-Benz Financial Services, changed the contact email address from the Second Uribe Email Account to the Arslanian Email Account, and made a \$4,000 payment on the Mercedes-Benz Automobile directly.

64. The contents of the Hana Cellphone, the Arslanian Cellphone, the [REDACTED] Cellphone, the Arslanian iCloud Account, the Arslanian Email Account, and the [REDACTED] iCloud Account, together with information provided in response to grand jury subpoenas, show that [REDACTED] apparently participated in providing carpeting services to Arslanian, including purportedly paid for by Hana, and received assistance for the immigration case of [REDACTED] s brother. For example:

a. On or about February 16, 2019, Arslanian emailed Menendez, among other things, “The basement guy and [REDACTED] will be here at 8 am tomorrow”.

b. On or about March 2, 2019, Arslanian texted [REDACTED] “I forgot to ask your brother’s name,” to which [REDACTED] responded [REDACTED]. The next day, [REDACTED] emailed Arslanian attaching photographs of a Board of Immigration Appeals decision dismissing the appeal of [REDACTED] from an order of removal entered by an Immigration Judge.⁶⁷

c. On or about March 24, 2019, Arslanian texted [REDACTED] “Hi [REDACTED] it is very kind of you to tell me I can call anytime but you have not been answering any of my text messages or voicemails please let me know about tomorrow Bob just went downstairs and asked me again why the basement is not finished. I understand you are busy if you cannot do it please let me know as I will have Home Depot come and do it.” [REDACTED] texted Arslanian, “Hi naden i will be at the

⁶⁷ From speaking to other law enforcement personnel, I know that on June 30, 2022, [REDACTED] was interviewed by the FBI and prosecutors from the Southern District of New York, and stated, in substance and among other things, that [REDACTED] requested assistance from Menendez, through Arslanian, to enable his brother to travel abroad to visit their ailing mother, and this was the only favor [REDACTED] asked Arslanian or Menendez for.

office tomorrow I will let you know when i see will”.⁶⁸ The next day, Arslanian responded, in part, “Good morning . no problem I did not know he was coming with the guys for the carpet. But that’s not a problem please let me know.” and “I am sorry I reached out to you . I did not realize I had to go through Will to talk to you.”

d. On or about April 1, 2019, Arslanian texted Hana via WhatsApp, “You did not have one minute to text me on the way to the airport? It’s Monday you promised the guy would come for the carpet. But I’m sure you’ll be able to answer the phone about next Monday’s meetings and dinner”.

i. Based on text messages exchanged between Arslanian and Hana in which Arslanian said that “Bob” was asking about the plan for the following Monday and who he would be meeting, and Hana listed several Egyptian officials, I believe that Arslanian’s reference to “next Monday’s meetings and dinner” referred to, potentially among other things, then-planned meetings involving Menendez, Hana, and Egyptian officials.

e. The next day [REDACTED] texted Arslanian, in part, “I’m just I’m gonna go Home Depot get it the stuff I’m going to come into your house”. Later that day, [REDACTED] texted, “I’m outside”.

f. Shortly after midnight on April 26, 2019, Arslanian texted Hana, “I got of the phone with him about an hour ago. I’m sorry to text you late but he left all of tomorrow free so he can help me in the house because he thought the carpet would already down. I text [REDACTED] twice today no answer once yesterday no answer he keeps telling me he will get back to me and never does I I asked him if he could at least drop the carpet off. could you please let me know tomorrow what is going on with it because now he’s really really pissed that he left the whole day free to help me move things from the garage and nothing can be done. I arranged for dinner tomorrow”.

⁶⁸ Based on the context, it appears that “will” refers to Hana.

g. On or about April 27, 2019, Arslanian texted Hana multiple pictures of what appeared to be a basement.

h. On or about April 28, 2019, Arslanian texted Hana pictures of what appeared to be a sketch of a basement with measurements, and wrote, “[REDACTED] measured it. I remeasured it yesterday.”

i. On or about April 30, 2019, Arslanian texted [REDACTED] in part, “A guy just called me that he is coming in 30-40 minutes to measure the basement and to look to see what kind of carpet is needed . I thought we did all this two months ago. I hope he is still going to do the carpet today.” [REDACTED] responded, “Call you after are meeting Wael he confirmed yesterday with the guy to do it and give him the invoice I do get the carpet home but don’t worry about what I have Wael he is playing anyway”. Based on context, I believe “playing” is a typographical error for “paying,” and that [REDACTED] was referring to Hana paying for the basement carpeting renovations.⁶⁹

j. On or about June 24, 2019, Arslanian texted [REDACTED] the name and phone number of an attorney, and wrote, “He is the best immigration lawyer. Bob spoke to him today. Tell him senator Bob Menendez told you to call him”.⁷⁰

k. On or about July 11, 2019, Arslanian texted [REDACTED] “I changed the lawyer’s appointment for tomorrow. She is very very unhappy . She does not think I am serious. Please

⁶⁹ Arslanian also corresponded with Uribe concerning the carpet. For example, also on April 30, 2019, Arslanian texted Uribe, “Good morning. I have my car back. THANK YOU I’ve been emptying the basement with my son all morning hopefully they will put the carpet by noon as I was told yesterday and the day before yesterday.” Uribe responded, “Good morning girl. Enjoy your car. Let’s hope on your carpet.” That afternoon, Arslanian texted Uribe, “LMAO [*i.e.*, Laughing My Ass Off] ... no carpet”. Uribe then texted “Call Neden” and “I do not have his number”. I believe based on the context that when Uribe was stating “I do not have his number,” he was referring to not having [REDACTED] number.

⁷⁰ As noted in footnote 86, below, this attorney was also the [REDACTED] at all relevant times.

make sure I have every single possible paper tonight.” [REDACTED] responded, “I just speak to Andy Andy going to bring it with him every single thing he have”. Later that day, Arslanian texted [REDACTED] “VSRV VERY VERY important to get bank picture.” Moussa responded, “I’m gonna try make it happen tomorrow”, and Arslanian replied, “That is going to make it the case in two weeks go away”. Moussa responded, “Who case” “?”, and Arslanian replied “Your brother”. [REDACTED] then wrote, “Thanks so much” followed by a thumbs-up and a prayer emoji.

65. Based on the contents of the Hana Cellphone, the Arslanian Cellphone, the [REDACTED] Cellphone, the Arslanian iCloud Account, the Arslanian Email Account, and the [REDACTED] iCloud Account, together with information provided in response to grand jury subpoenas, I have learned that [REDACTED] provided additional home improvement services and gifts to Menendez and Arslanian. For example, based on those sources, I have learned the following:

a. On March 11, 2020, Arslanian texted [REDACTED] in part, “Is it possible to put cement in the hole in front of the front door?” [REDACTED] responded, “No problem I’m gonna be there for o’clock we fix it for you”.

b. On April 18, 2020, [REDACTED] texted Arslanian, “Hi Nadeen please can you open the front door I leave something for you”. Later that day, Arslanian texted [REDACTED], in part, “Good morning [REDACTED]. just saw this . it is amazing I love love love taking pictures. How did you know?” and, “I can’t wait for Bob to wake up for me to show it to him. Thank you [REDACTED] so much.”

c. On May 16, 2020, Arslanian texted [REDACTED] “Last night the mantle on the fireplace broke and fell if you find two brackets to hold the shelf up can you please get them I will pay you for everything when you get here”.

66. Based on the contents of the Arslanian Cellphone, the [REDACTED] Cellphone, the Arslanian iCloud Account, and the [REDACTED] iCloud Account, together with information provided in response

to grand jury subpoenas, I have learned that in or around May and June 2020, [REDACTED] performed some home improvement services for Arslanian and Menendez,⁷¹ and proposed an arrangement of some sort with Menendez. Based on those sources, I have learned the following:

a. On May 22, 2020, Arslanian texted Moussa, “Thank you so much [REDACTED] You are God sent. I will ask him tonight.” [REDACTED] responded, “Thank you and God bless you.” The next day, Arslanian wrote, in part, “Good morning . I spoke to him last night and he said it’s a very good idea and he will help you with that.” Shortly after that, Arslanian wrote, “He said he could not believe what a perfect job you did a professional could not have made it look any better than what you did thank you”. Several minutes later, [REDACTED] responded, in part, “Thank you for asking about my favor thank you so much”.

b. On May 24, 2020, Arslanian texted [REDACTED] “Do you have some thing to unscrew these two screws? Bob wants to clean the window but he cannot take the outside window off . If you are available today or Tuesday to help him he does not know how to take this window out. Tomorrow he is not here.” [REDACTED] responded, “Hi Nadeen don’t worry I have all the tools Can I come in to you Tuesday I do for you And I bring in the corner with me and the extension two”. Later that day Arslanian texted, “If you have a power washer can you bring it with you or else if you can rent it we will pay you for it for the day Bob wants to power wash the back”. Approximately half an hour later, [REDACTED] wrote, “Don’t worry I’m gonna bring it everything I’m gonna clean all the house from outside”.

⁷¹ Based on my participation in the investigation, including my review of messages between [REDACTED] and Arslanian, as well as documents produced by financial institutions in response to grand jury subpoenas, I believe that Menendez, who was at that point engaged to Arslanian, had moved into Arslanian’s house and lived in her house as of at least in or about May 2020.

c. On May 26, 2020, Arslanian, using the Arslanian Cellphone, left [REDACTED] a voice message in which she said, “Hi [REDACTED] it’s Nadine, I’m sorry to bother you, um, Bob was gonna do a CNN interview and he canceled it because he wanted to do the work outside with you. I wanted to know if you had an emergency. Please let me know so I can tell him ‘cause he’s been waiting outside. I’m sorry to bother you and I appreciate everything you’re doing, I just wanted to know the schedule. Thank you [REDACTED]” Later that day, Menendez, using the Arslanian Cellphone, left [REDACTED] a voice message in which he said, “Hey [REDACTED] it’s Mr. Menendez, I hope you’re OK, uh, I’m not sure if you got stuck at something or had some emergency but just let us know, ‘cause I’m here waiting for you and I don’t want to lose the day. Thanks [REDACTED] uh, give us a call, bye.”

d. On May 27, 2020, Arslanian texted Moussa, “He is on Tv interviews today from 12-5 pm . Don’t worry we will get it done .” and “I can’t believe how much you do . He was walking around yesterday and was so happy .”

e. On June 5, 2020, Arslanian texted [REDACTED] “Good morning [REDACTED] we are home. Today’s the only day Bob is home all day. He was asking what time is good for you to come over?” [REDACTED] responded, “Any time I am home today let me know when it’s good for you to come in”. Arslanian then replied, “Do you have a small can of black paint? Bob wants to paint the bottom of the front door. It’s supposed to rain around 6 pm so if you can come now it’s great. Whatever papers you have also for the liquor store I don’t know if you need papers also bring them with you.” and, “Thank you so very very much [REDACTED] replied, “Can I coming around 2:30,” and Arslanian wrote back, “Great . Thank you [REDACTED]

f. On June 7, 2020, [REDACTED] texted Arslanian, “I think the reception is very bad here can you talk when I come and see you after 45 minutes”.

g. On June 11, 2020, Menendez, from the Menendez Office Number—*i.e.*, the same phone number that called [REDACTED] on January 29, 2019, as described in paragraph 51.o—left a voice message for [REDACTED] in which he said, “Hey [REDACTED] it’s Bob Menendez, hope you’re well, just wanted to call and say thank you so much, uh, when I got back, the paint job looks fantastic, the stairs and the solarium, uh, look great, uh, the front looks great, really helped, uh, transform the house so thank you so much for all of, uh, your work, and, uh, I am working on what we talked about, I put out a bunch of feelers let’s see what happens, and I look forward to seeing you in the future. Take care.”

i. At 3:02 p.m. that day, Arslanian texted [REDACTED] “Hi Nader. I hope all is well. Bob left you a voicemail this morning .” [REDACTED] responded, “Hi NADEN.I just got bop,s massage tell him any time and whatever you need..”

h. On June 27, 2020, Arslanian, using the Arslanian Cellphone, left a voice message for [REDACTED] in which she said, “Hi [REDACTED] It’s Nadine. I hope you are well, the whole family is well. Bob was asking if you had any updates, if you got in touch with the guy. Any updates, anything happened. He’s been asking me yesterday and today about how it’s going. So I hope it’s going well and the family are well.”

i. Between approximately July 3, 2020 and August 12, 2020, Arslanian and [REDACTED] exchanged a number of texts regarding [REDACTED] fixing Arslanian’s garage door and bringing a friend to cut down tree branches from Arslanian’s property, including a text from [REDACTED] on August 12, 2020 saying, “Hi Nadine I’m outside”. On August 13, 2020, Arslanian texted, “Bob is soo happy that the car is in the garage especially with all the rain we are having. Because it’s a soft top sometimes water comes in.”⁷² and “I forgot to ask you I was in the shower

⁷² Based on context, I believe the “car” with the “soft top” that Arslanian referred to is the Mercedes-Benz Automobile that Uribe was paying for. Based on conversations with an FBI agent

how much it cost for the garage door please you have to tell me when you come and how much for the tree cutter people.” and “Thank you for everything.” [REDACTED] responded, “You’re very welcome call me anytime”.

- i. On September 3, 2020, Arslanian texted [REDACTED] “Hi [REDACTED] I just wanted to let you know that the man that you got the garage parts from please get a refund from him . do not pay the bill . the garage has not been working the belt is broken again so I called somebody they’re going to come and change the whole unit tomorrow but please get your money back for the garage doors thank you [REDACTED]”. [REDACTED] responded, “I’m sorry for her than a gene but I already paid the company don’t worry about it”.⁷³
- ii. On October 22, 2020, Arslanian texted Menendez, “You got an envelope delivered from the people who cleaned up the branches after we cut the trees down”.⁷⁴

67. From my review of materials, I have learned that the contents of the [REDACTED] iCloud Account and Arslanian iCloud Account, together with information provided in response to grand jury subpoenas, show that beginning in or around at least August 2020, [REDACTED] who is identified on [REDACTED] website as the company’s owner and CEO, both participated in seeking Menendez’s use of his influence to obtain COVID-19 testing contracts and/or other authorization for [REDACTED] with various New Jersey municipalities, apparently in exchange for, as described in paragraph 68, tens of thousands of dollars which [REDACTED] participated in paying to Arslanian and her company. Specifically:

who conducted surveillance outside of Arslanian and Menendez’s residence on or about May 12, 2022, and my review of a photograph taken by the FBI during that surveillance, on that date a Mercedes-Benz convertible with a soft top was parked outside the residence.

⁷³ I believe that “I’m sorry for her than a gene” might be an inaccurate voice-to-text software rendition of “I’m sorry to hear that Nadine.”

⁷⁴ From speaking to other law enforcement personnel and reviewing an FBI report, I have learned that on June 16, 2022, [REDACTED] was interviewed by the FBI and claimed that he had provided Arslanian, among other things, a lawnmower, and that when Menendez learned of the lawnmower, he became angry and told Arslanian she had to pay [REDACTED]

a. On August 14, 2020, the [REDACTED] Cellphone engaged in multiple telephone calls with the [REDACTED] Cellphone, and multiple calls with the Arslanian Cellphone.

b. On August 16, 2020, Arslanian texted [REDACTED] in part, “Hi Nader. It’s two days now I am waiting for an answer. Your friend said he would let us know that same day . It’s been two days. Did you hear back from him?”. [REDACTED] then forwarded this text message to [REDACTED]

c. On September 21, 2020, the Arslanian Cellphone called the [REDACTED] Cellphone. On September 23, 2020 (*i.e.*, two days later), the Arslanian 007 Phone called the [REDACTED] Cellphone. The Arslanian Cellphone and the Arslanian 007 Phone engaged in multiple calls and several text messages with the Abdalla Cellphone over the ensuing months.

d. On October 8, 2020, [REDACTED] texted [REDACTED] “Hi Nadine , hope you are well and safe in this crazy Pandemic. I miss you guys so I said let me check if you need anything I can do for you or Bob .hope to hear from you soon”. Approximately two minutes later, Moussa sent this message verbatim to Arslanian.

e. On October 12, 2020, [REDACTED] texted Arslanian, “Hi Nadine I can’t coming today for the backyard because it’s raining tell me what date is good for to come in ? My friend he doesn’t receive phone call today”. Arslanian responded, “Tomorrow we are not home . any other day that’s good for you we are home Wednesday or Thursday.” [REDACTED] replied, “Ok”, and then wrote, “My friend he doesn’t receive any phone calls”.

f. On October 26, 2020, [REDACTED] texted Arslanian, “My friend he doesn’t receive anything”.

g. On November 2, 2020, [REDACTED] texted Arslanian, “I’m outside”. Approximately 2 hours later, Arslanian texted [REDACTED], “Can’t thank you enough for today”.

h. On November 23, 2020, the Menendez Cellphone initiated calls with the personal cellphones of the [REDACTED] and the [REDACTED]. These were the first telephone contacts reflected in the available records between the Menendez Cellphone and the [REDACTED] and the first telephone contacts reflected in the available records since 2019 between the Menendez Cellphone and the [REDACTED]. Through December 16, 2021, the Menendez Cellphone engaged in two calls with the [REDACTED] and several calls with the [REDACTED].

i. On November 23, 2020—*i.e.*, the same day as the Menendez Cellphone contacted the [REDACTED]—Arslanian texted [REDACTED] from the [REDACTED] will be contacting you for [REDACTED] and “Please call me [REDACTED] and “I have 5 additional cities for you as well but I will call you about them later. That is five other ones than the ones we spoke about earlier this morning.”⁷⁷

j. On December 6, 2020, Arslanian texted [REDACTED] “Hi. Out of these three machines what is the earliest that you have been able to get a delivery and if you have any contacts please let me know. I’m trying to do this on my own first. Because people are upset with him that he promised them all the testing and he told me that I never told him we did not have the machines ready” and two crying emoji, and “It was two weeks almost a face-to-face meetings with every

⁷⁵ Additionally, the Menendez Cellphone has had a number of contacts with the personal cellphone of the [REDACTED] dating back to at least 2018 and through at least 2021.

⁷⁶ I believe [REDACTED] is a misspelling of [REDACTED] at the time and an immigration attorney, as referenced in footnotes 70 and 86.

⁷⁷ The investigative team does not have access to calling records for Menendez’s office phones for November 23, 2020.

single mayor to get all these OK for us and he is very upset and embarrassed so I'm trying to do everything I can to see how we can get the machines." Based on the context—including that this text came almost two weeks after the November 23, 2020 calls and text messages about contacts with New Jersey mayors described in paragraphs 67.h and 67.i, above—I believe that the "he" Arslanian is referring to is Menendez, and that when she states "It was two weeks almost a face-to-face meetings with every single mayor to get all these OK for us and he is very upset and embarrassed," Arslanian is referring to Menendez's contacts to New Jersey mayors to secure authorization for [REDACTED] to perform testing.

k. On December 19, 2020, [REDACTED] texted Arslanian, "Hi Nadine, how's everything? I received the camera system. If you have a chance we can meet today, let me know. Thank you!"⁷⁸ Arslanian responded, "I told Bob he is so so happy. He says now he doesn't have to worry all the time about me. I am going at 6o'clock to go pick up my son. But I will be home all day tomorrow and all day Monday if that works for you." and "Thank you so so much". Later that day [REDACTED] wrote, "Okay, I'm gonna give you a call before I come tomorrow. I'll install the camera system for you and I'll get everything and if you need anything let me know."

l. On December 22, 2020, [REDACTED] texted Arslanian, "I forgot to ask you do you want me to bring it [REDACTED] with me tomorrow?" I believe, based in part on the context that much of the content on the [REDACTED] iCloud account is in Arabic, that [REDACTED] may be an incorrect

⁷⁸ I believe, based on context, that "the camera system" refers to a home surveillance camera system for Arslanian and Menendez's home.

rendering of [REDACTED] The next day, Arslanian wrote to [REDACTED] writing, "He said He will have to meet him sometime this weekend out somewhere."

m. On January 8, 2021, Arslanian texted [REDACTED] "I mailed the check ." [REDACTED] responded, "This check for what ?" Arslanian replied, [REDACTED] laboratory for the blood work he did" [REDACTED] then wrote, "Don't send this bill I will take care of this check don't worry about it". Arslanian wrote, "No no I already mailed it 2 days ago." [REDACTED] responded, "Oh my God I already took care of it" and "Can you please stop the check".

n. On January 11, 2021, [REDACTED] texted [REDACTED] "Hi [REDACTED] just to let you know I didn't receive any calls or emails today also I txted [REDACTED] because he asked me to let him know if I didn't receive anything till Monday".⁸⁰

o. On January 13, 2021, [REDACTED] texted Arslanian, "Hi Nadine I hope everything is okay I want to let you Know my friend doesn't receive any phone call no e-mail for right now Let me know if I have to do anything".

p. On January 16, 2021, Arslanian texted [REDACTED] "He LOVES the bottle . Thank you." [REDACTED] responded, "You're very welcome".

q. On February 15, 2021, Arslanian, using the Arslanian Cellphone, left a voice message for [REDACTED] stating, "Hi [REDACTED] *how are you?* I hope I am not waking you up. I wanted to tell you *that my husband came yesterday, and worked until two O'clock and woke up at 6:30.* The only thing he said to me is the [REDACTED] *called him on the phone twice and is very mad*

⁷⁹ [REDACTED] phone number is saved in the [REDACTED] iCloud Account under the name [REDACTED] and in other portions of the [REDACTED] iCloud Account [REDACTED] refers to [REDACTED] such as paragraph 68.w.

⁸⁰ Based on public information and other references to calling a [REDACTED] in the [REDACTED] iCloud Account, I believe that [REDACTED]

at him, because no one called him for the COVID test. He wants the COVID testing done. So, I do not know if [REDACTED] as the number or not but it is in [REDACTED] NJ. So if you do not have the number, I will give it to you in the afternoon, but if he has it have him give him a call. I do not know if they are open today, it is a holiday, but tomorrow for [REDACTED]

⁸¹

r. On February 16, 2021, [REDACTED] texted Arslanian, “What time u wanna me to come and install the tv for u”. Later that day, he texted, “Iam outside”. The next day, Arslanian texted [REDACTED] “Bob Just saw the sink and the pink cigar lighter filled with fluid gas. He is so so happy. Thank you very very very very very very very very very very very very very very much”. Moussa responded, “You are very welcome” and sent a thumbs-up and a prayer emoji.

s. On February 19, 2021, Arslanian texted [REDACTED] “If you have the Tv and bracket let me know. Will be home by 9 pm. Need to speak to you”. [REDACTED] responded, “Hi Nadine, please before you get home by 30 mins let me know. I have everything ready for you and get home safe!” Later that day, [REDACTED] texted, “I am going be there Do you want me to bring [REDACTED] with me today or not”.⁸² Arslanian responded, “Let me ask Bob . He is still speaking”.

t. On February 22, 2021, [REDACTED] texted Moussa, “I spoke to the Counsil he said I am busy now call me in an hour” and “I called mayor stack and left him a voicemail”. Based on the context and public information, I believe that the reference to [REDACTED] [REDACTED] at the time. [REDACTED] forwarded both of these messages to Arslanian. Within a minute of receiving the forwarded message concerning leaving a voice

⁸¹ The italicized portions in this paragraph represent preliminary draft translations, subject to revision, of portions of the voice message that were spoken in Arabic.

⁸² [REDACTED] then forwarded, by text message, this response to [REDACTED]

message for [REDACTED] Arslanian responded to [REDACTED] “Ok” with a thumbs-up emoji, and “Did you leave him your number so he could call you back? Thank you for all you do” with a prayer emoji. [REDACTED] forwarded Arslanian’s message to [REDACTED] and responded “Yes” to Arslanian.

u. On February 23, 2021, an individual in [REDACTED] [REDACTED] ⁸³ texted [REDACTED] “Sorry, I can’t talk right now.” [REDACTED] responded, “My name is [REDACTED] Please give me a call when you have a chance”. The Passaic Official replied, “How did you get my number”. Several minutes later, [REDACTED]—who had exchanged a series of short telephone calls with [REDACTED] leading up to this message—texted [REDACTED] “Hi my name is [REDACTED] I am from [REDACTED] and I been refereed to you by senator bob Mendez to do COVID testing”. [REDACTED] then sent this text verbatim (including the typographical errors) to the Passaic Official.

v. On March 5, 2021, Arslanian texted [REDACTED] “Also please Don’t forget to speak to [REDACTED] he thinks you did the 700. So please tell him that you did only 51 and that you wanna do the rest of the 650.” and “Bob asked me first thing if you did [REDACTED] please let me know if you did it and what they”. I believe, based on context, that “the 700” refers to 700 patients planned to be administered COVID-19 tests, and that the “51” refers to the patients who had already been tested.⁸⁴

⁸³ Arslanian had previously texted Abdalla this individual’s number and identified him as an employee in the office of [REDACTED] which I believe from public information to be a typographical error for [REDACTED]

⁸⁴ I know from public information that by this time, the federal government had passed legislation to provide billions of dollars in funding to pay for costs associated with COVID-19 tests.

w. On March 6, 2021, Arslanian texted [REDACTED] "Hi [REDACTED] . . He walked in 10 minutes ago and the first thing he said to me is how many did you do in [REDACTED]? and what did [REDACTED] say about the police. ? I had no answer and he turned around and went to a meeting. I cannot believe what this is costing in terms of personal sacrifices. I I don't know what the answer is I have not heard from anybody today." I believe, based on the context and my participation in the investigation, that the "he" Arslanian is referring to is Menendez. [REDACTED] forwarded this text to [REDACTED] and responded to Arslanian, "Hi Nadine We take it 59 patients and the guy [REDACTED] call [REDACTED] and tell him He said take 23\$ each patient and [REDACTED] say no I can do this [REDACTED] say if you want to work with us you have to pay me 72k a year [REDACTED] say let think about it and I will give you a callback".

x. On March 9, 2021, [REDACTED] a texted Arslanian, "Good morning Nadine This church in [REDACTED] we start today 9:00am until 3:30 pm". Arslanian wrote, "Today?" and [REDACTED] responded, "Yes". Arslanian replied, "Bravo . I'm so happy"

y. On March 10, 2021, [REDACTED] texted Arslanian, "Hi Nadine We did [REDACTED] today, we did 11 patients today and 59 patients yesterday". Arslanian responded, "Thank you for letting me know. I am driving I will call you when I get home."

z. On March 12, 2021, [REDACTED] texted [REDACTED] "Elizabeth been calling since November 9 times last time was 3 days ago and the office manger for the [REDACTED] and she keeps blocking us so we never got the chance to talk to him . [REDACTED] same thing till finally I spoke to him and after that he never answered [REDACTED] we got one day a week and we did 2 weeks each time around 90-95 resident [REDACTED] keeps giving the run around since December till finally the mayor pushed him so hard and we got one remote church and we are there every day with a total number of people Swabed every day around 10-15 only

██████████ Council said ill do this and that and nothing till now also he referred us to ██████████ which I called him and as soon as introduced my self he said I am busy call me tomorrow. I called next day same thing I am busy and I don't have time call me after a week Spoke to ██████████ and after a while I checked agin as he requested he even txted and said I gave your information and it their call".⁸⁵ ██████████ then forwarded this message to Arslanian.⁸⁶

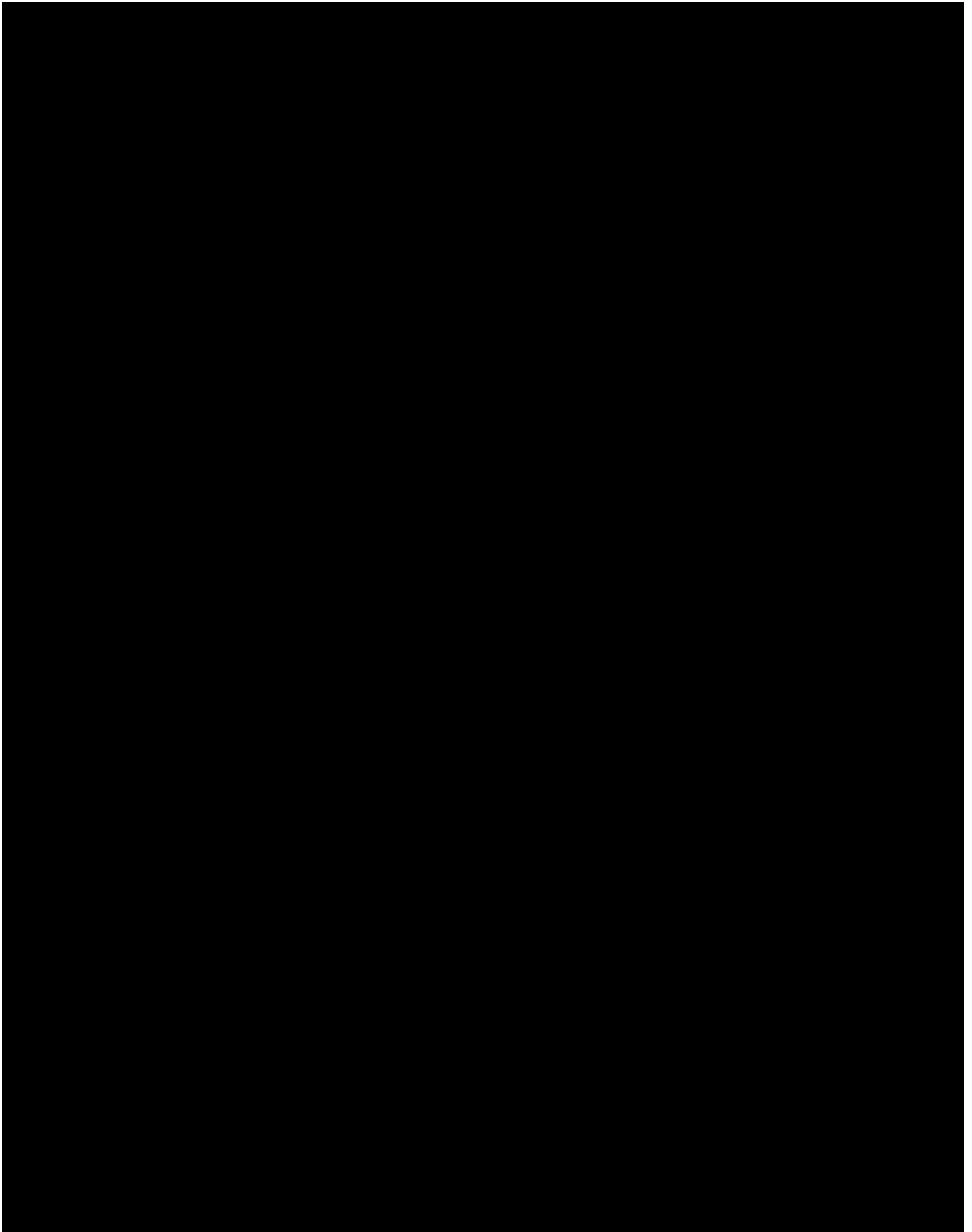
aa. On March 14, 2021, Arslanian texted Moussa, "I am so happy Moataz came and he got to tell Bob himself about the different cities. Bob is so upset with the People working in the cities. I am so happy he got to talk to Bob himself". Moussa responded, "Very good and thank you for let Moataz talk to him and tall him everything".

bb. On March 15, 2021, Arslanian texted Moussa, "You have three days in ██████████ this week."⁸⁷

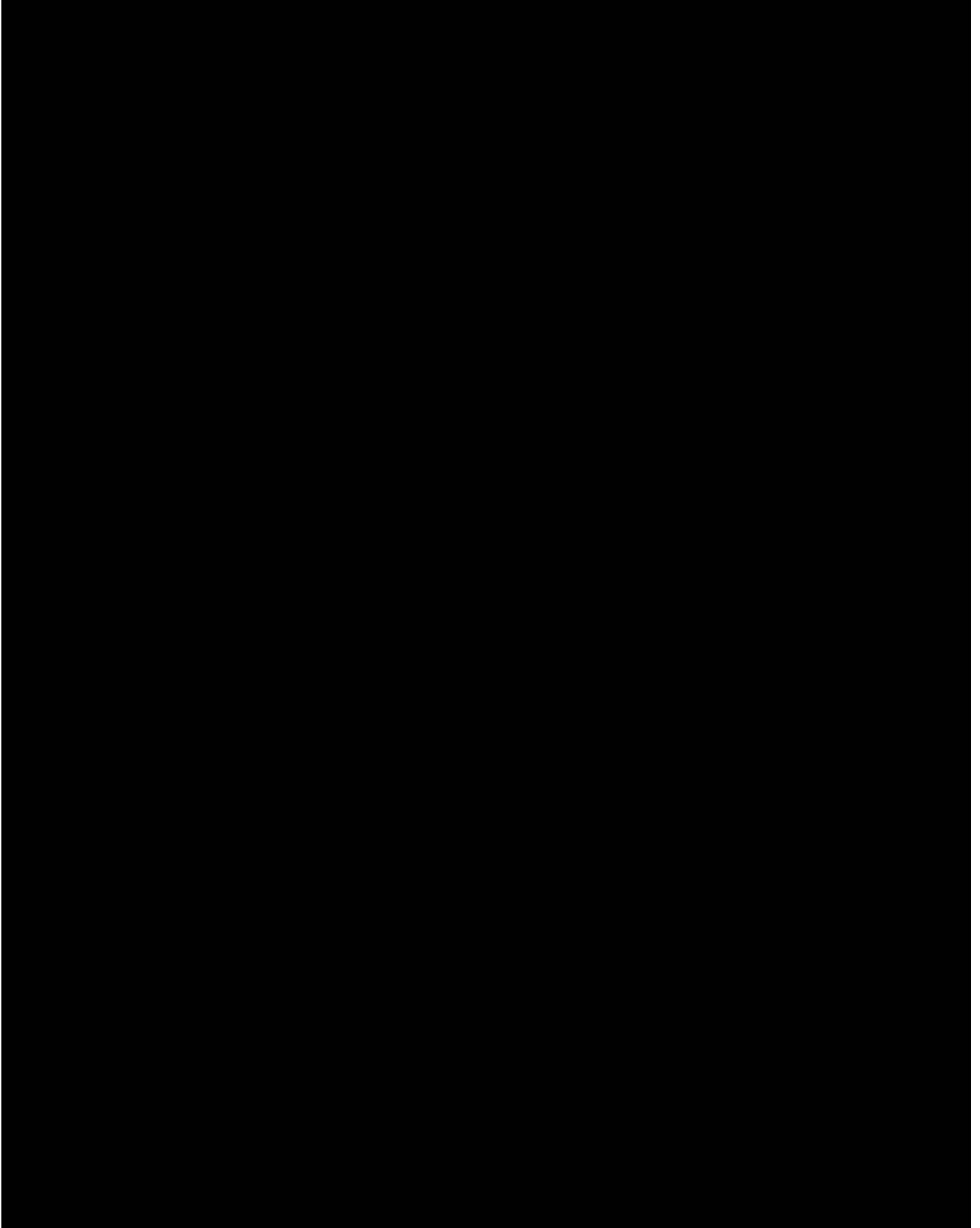
⁸⁵ From speaking with other law enforcement personnel and reviewing an FBI report, I have learned that ██████████ (the ██████████) was interviewed on June 16, 2022, and stated, in substance and in part, that, although he coordinated the physical spaces where COVID-19 testing sites were located, companies that wanted to conduct COVID-19 testing were not required to go through the city, and could just come into ██████████ and start testing. He also stated that while the ██████████ recommended ██████████, and did not recommend any other testing companies, the ██████████ did not personally feel any pressure to use ██████████. On August 24, 2022, the ██████████ was interviewed again and stated, in substance and in part, that the city's ██████████ had the authority to bar companies from conducting COVID-19 testing, but as a practical matter, during the relevant time periods, the City of Plainfield wanted more testing providers and was not turning testing providers away.

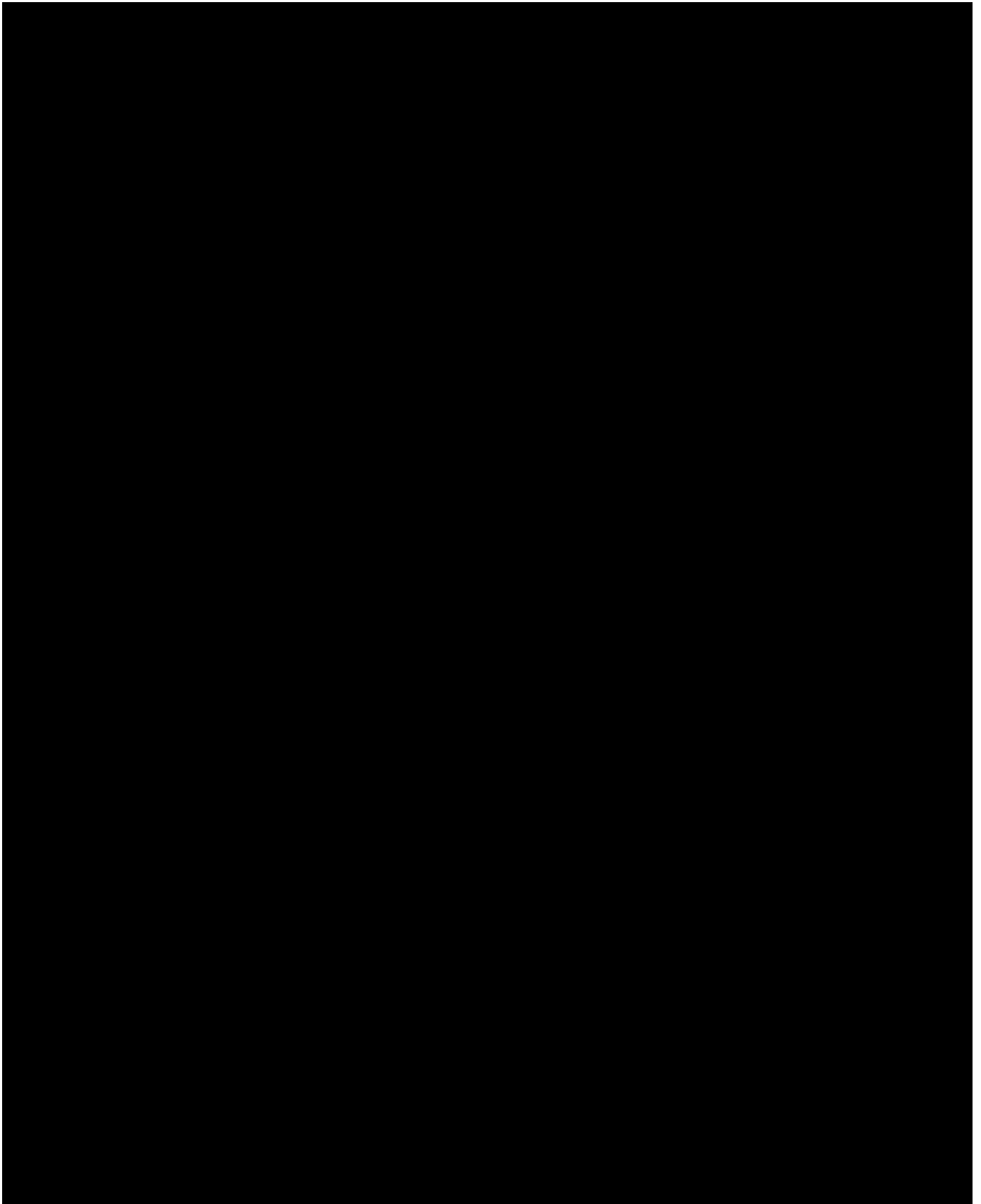
⁸⁶ Based on public information, I know that the ██████████ is a practicing lawyer, and appears to be the attorney whose contact information Arslanian provided to ██████████ as described in paragraph 65.j, above.

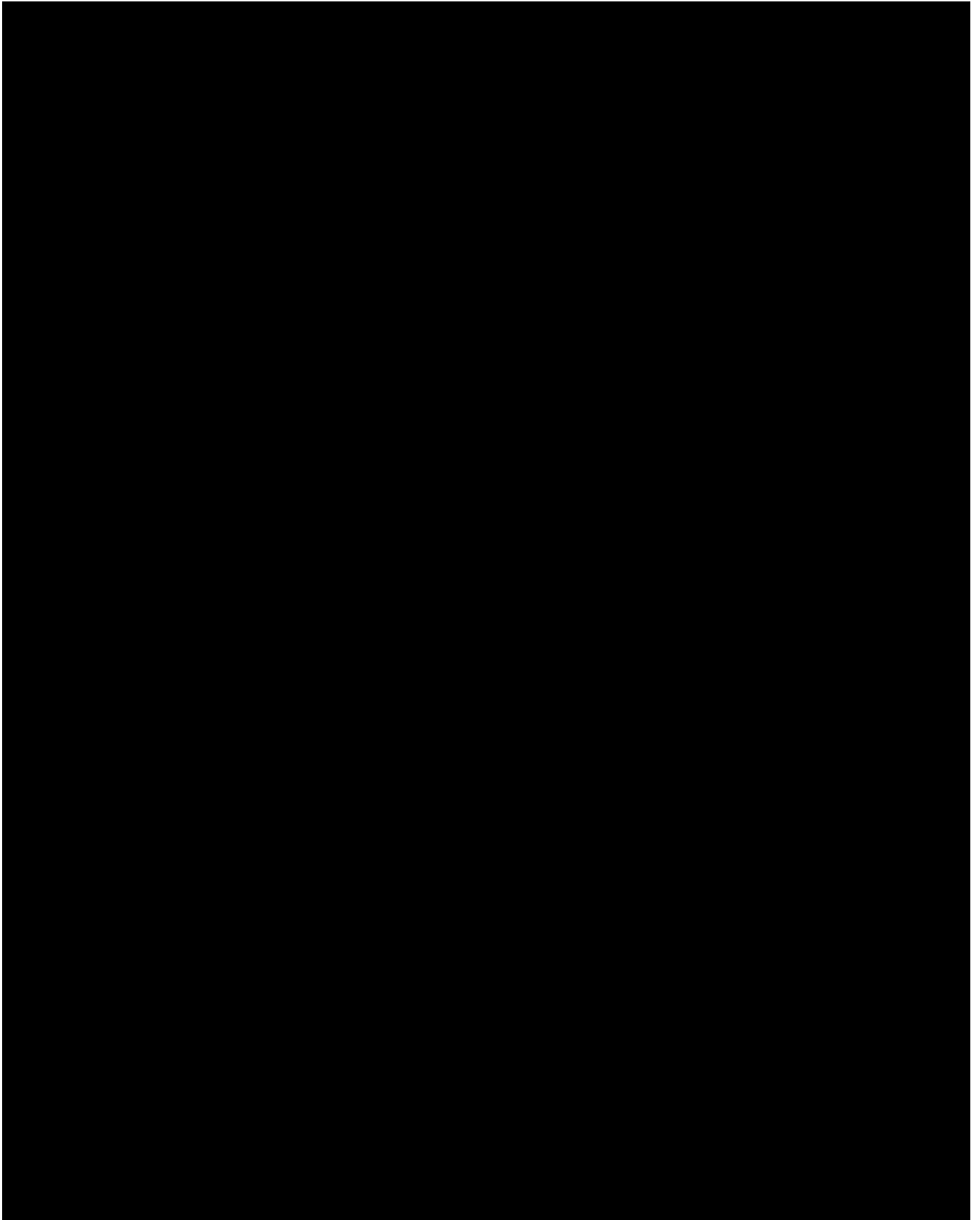
⁸⁷ Based on my conversations with law enforcement personnel and my review of interview notes and an FBI report, I have learned that (a) ██████████ was interviewed by FBI agents on June 16, 2022 and claimed that neither he nor ██████████ ever asked Menendez to help ██████████ that he asked Arslanian to help; and that Arslanian asked ██████████ to tell various officials that Menendez had sent

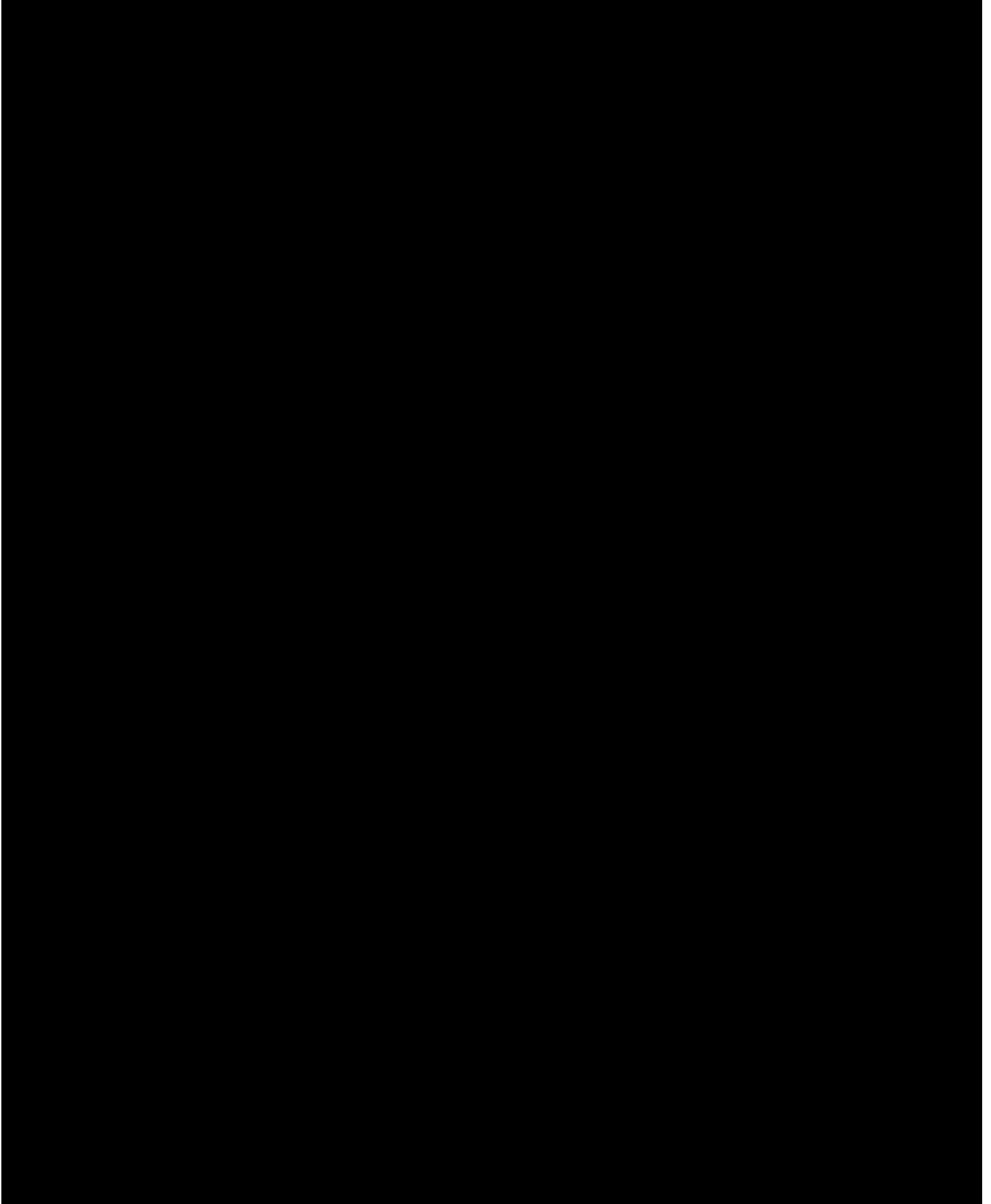


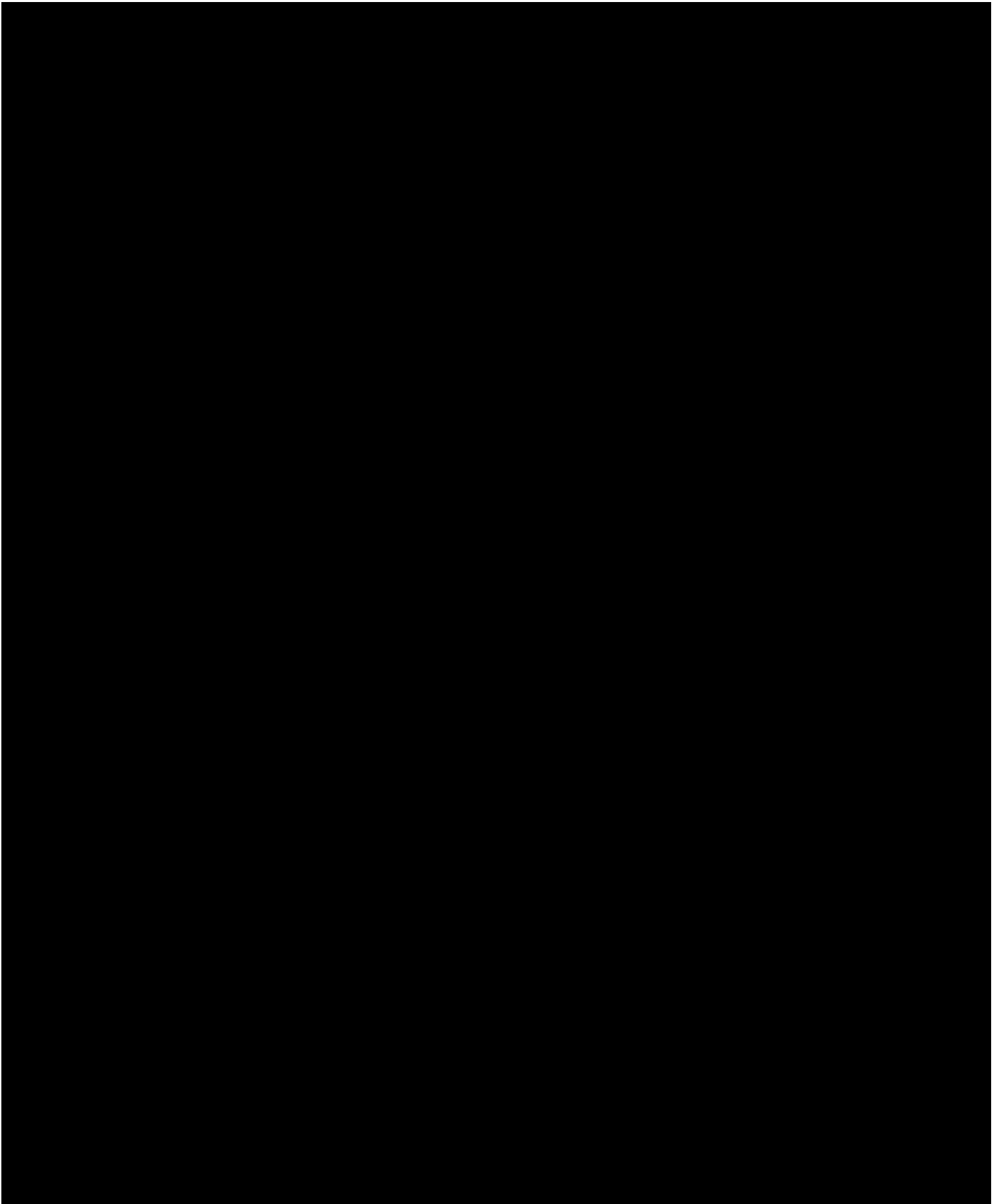
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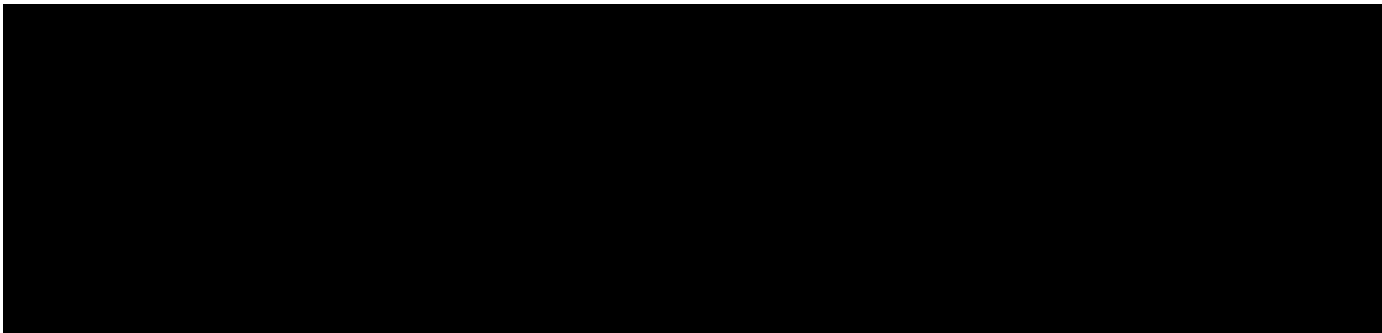




e. From talking to other law enforcement personnel, I know that on November 16, 2022, a former senior USDA official (the “Senior USDA Official”) was interviewed by members of the investigative team, and stated, in substance and relevant part, the following:

- i. In or about 2019, the USDA learned that the Government of Egypt withdrew its recognition from all halal certifying organizations in the United States except for the Hana Halal Company, which became the sole U.S. organization recognized by the Government of Egypt as authorized to certify halal compliance for exports into Egypt.
- ii. The USDA objected to this decision by the Government of Egypt, and took actions including the sending of a formal letter to the Government of Egypt expressing the view of the USDA disapproving of this decision.
- iii. Subsequently, Menendez called the Senior USDA Official’s cellphone and objected to the USDA’s alleged interference with the business of the Hana Halal Company.

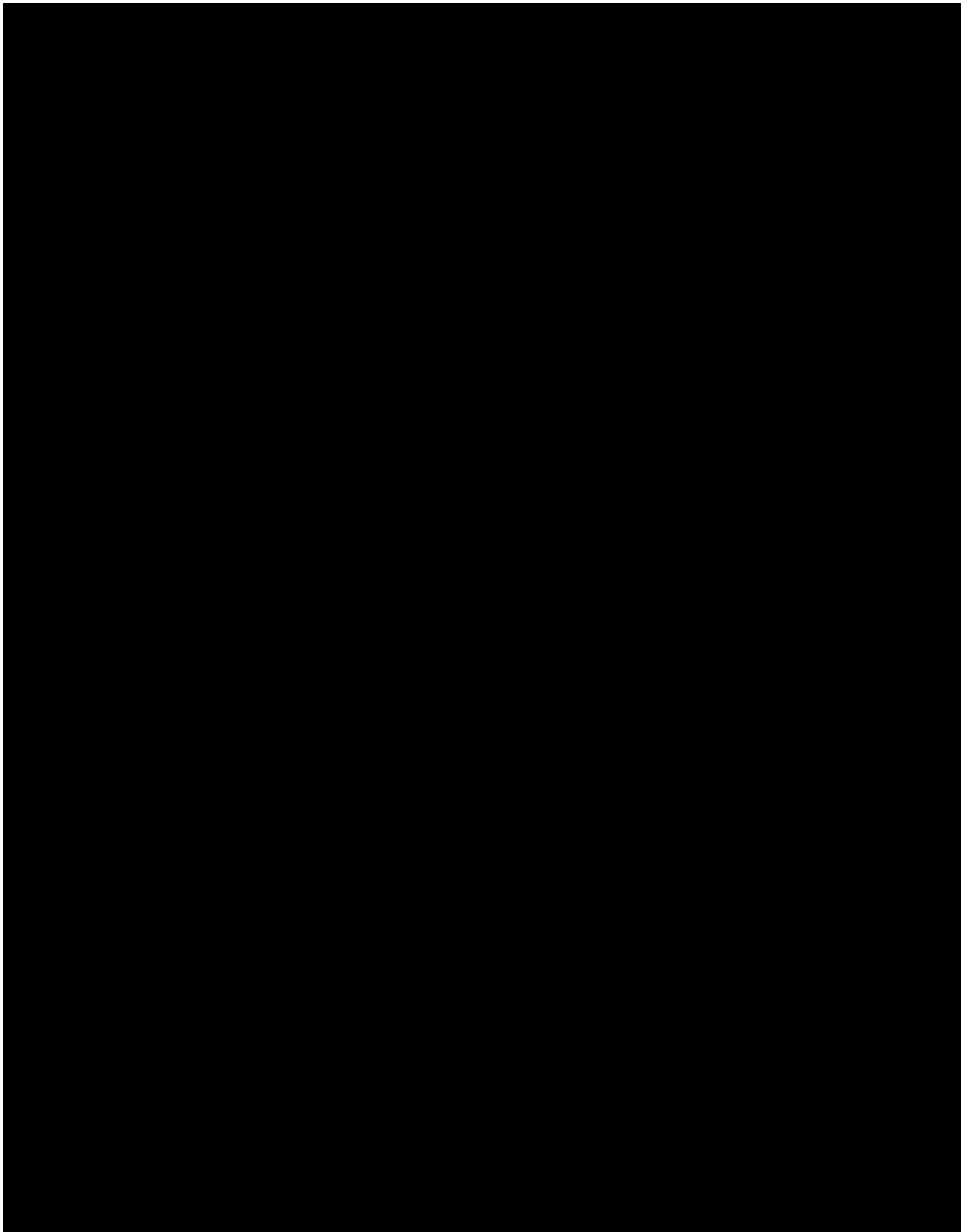
f. At approximately 7:54 a.m. on June 3, 2019, Hana texted Arslanian images of an apparent legal demand letter (the “Demand Letter”) from an attorney representing an individual (the “Plaintiff”) seeking a \$13.5 million settlement in compensation for what her attorney

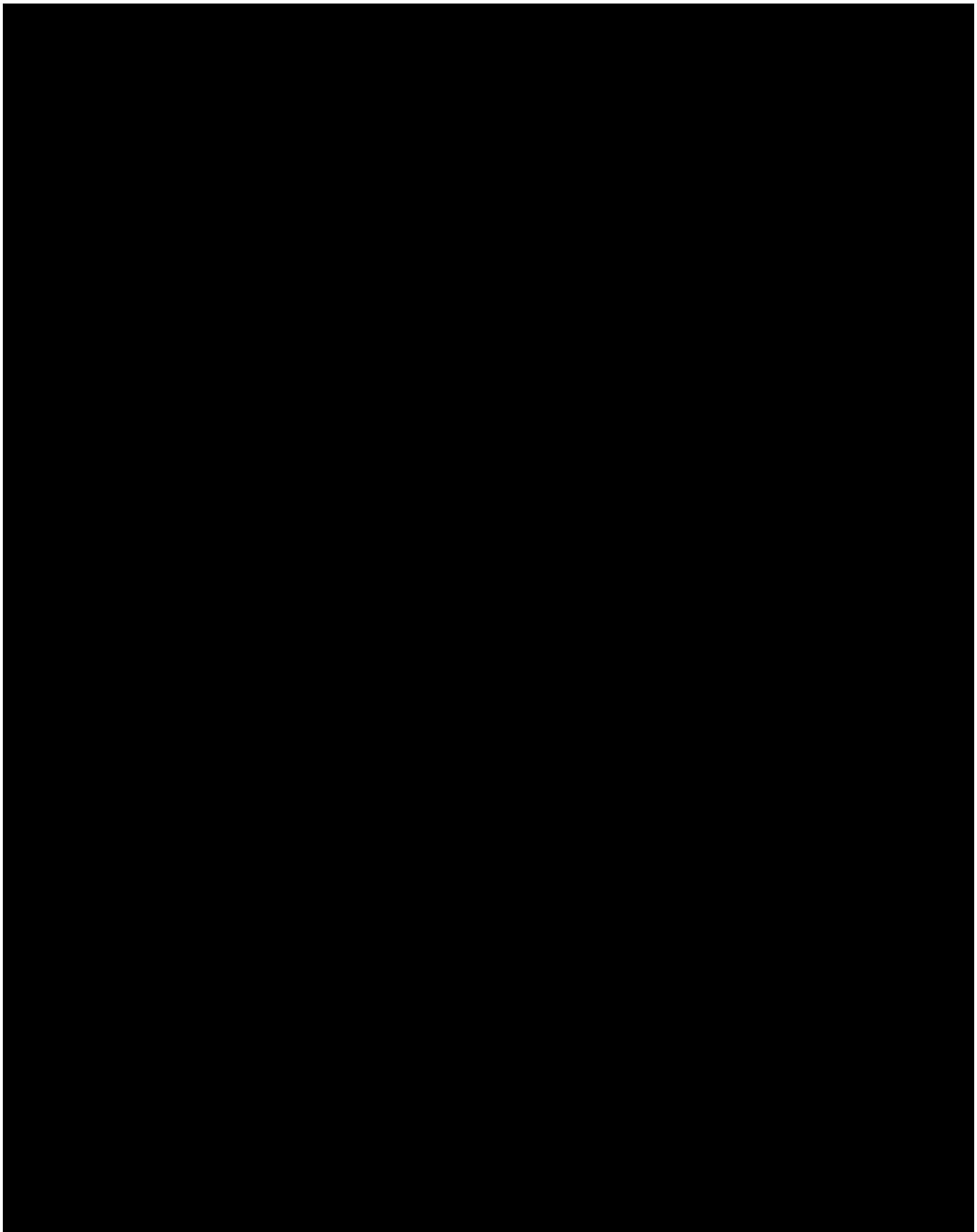


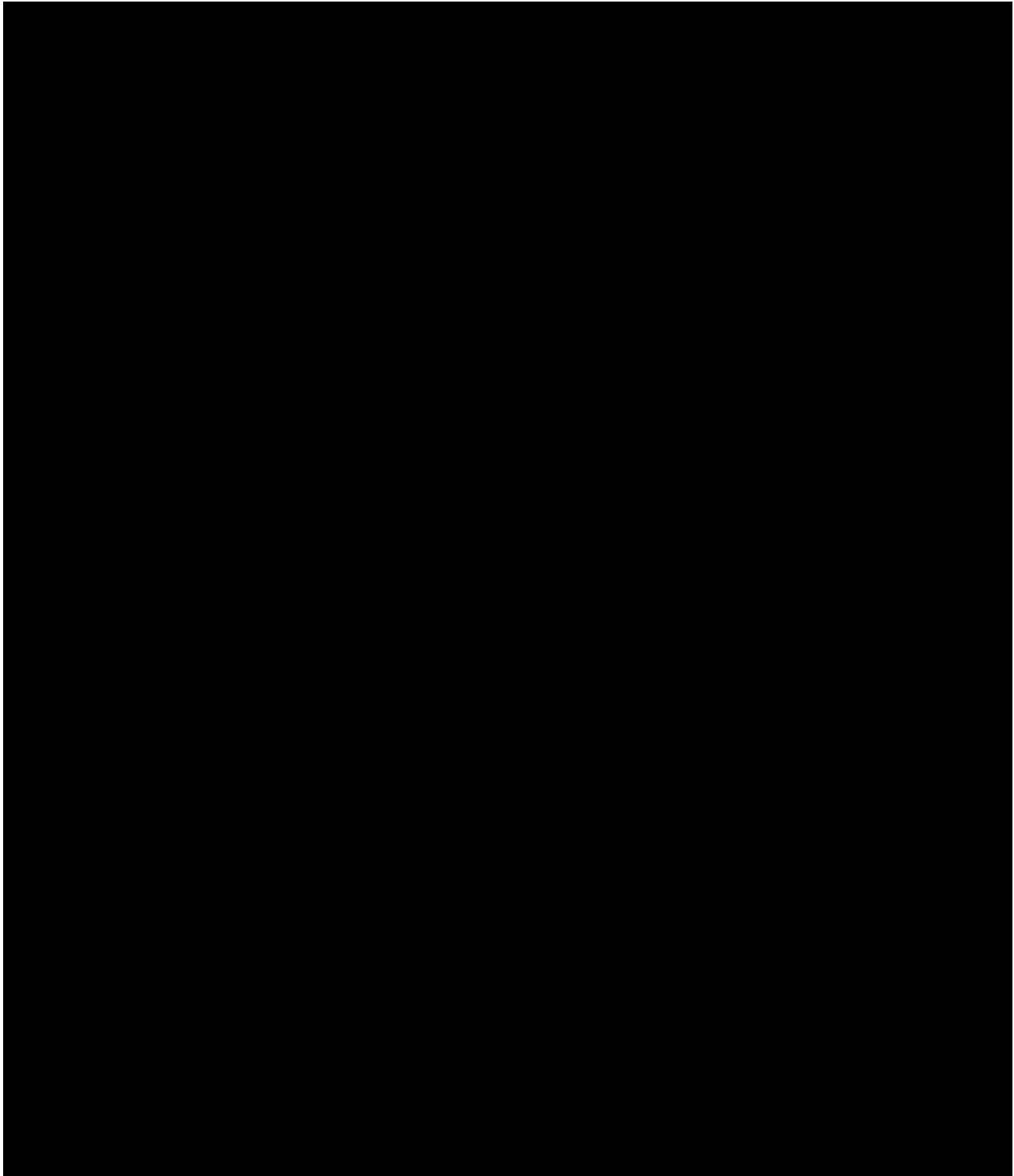
described as “Egypt’s liability”.⁹⁴ From public information, I know that the Plaintiff publicly claimed that Egyptian armed forces injured her while she was traveling in Egypt and sought compensation from Egypt, and that there was significant congressional interest in the resolution of the case. The Demand Letter also stated, “Although we accept your representation that we are currently dealing with a private entity that is not the Government of Egypt, it’s not lost on anyone – whether [the Plaintiff], the Congress or the Administration – that this situation is Egypt’s liability alone. It’s also not lost on anyone that Egypt could easily supplement any amount offered by any party to ensure [the Plaintiff] is properly compensated and Egypt’s involvement would not need to be disclosed.” The Demand Letter further claimed that Congress was considering legislative action to withhold financial aid from Egypt if it did not achieve a fair and “commensurate” settlement with the Plaintiff.⁹⁵

⁹⁴ I know from the contents of the Hana iCloud Account that on or about May 30, 2019, an individual I believe from the contents of the Arslanian iCloud Account (in which he was referred to in text messages and in a contact entry to have a government title) to be an Egyptian official had sent Hana images of the Demand Letter, which he subsequently forwarded to Arslanian.

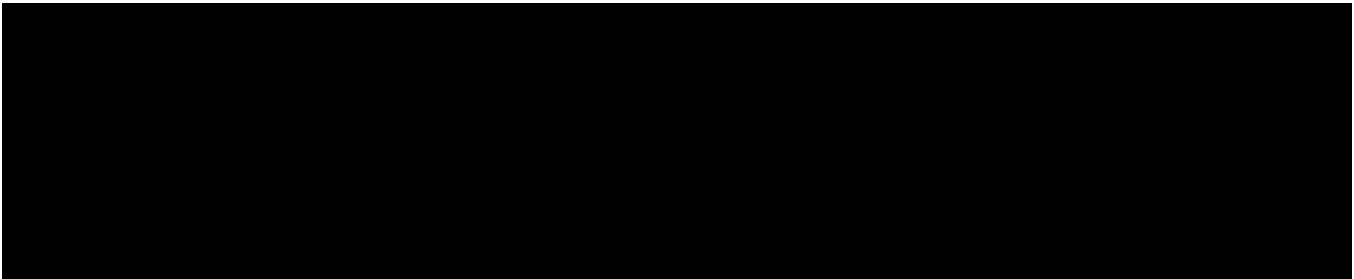
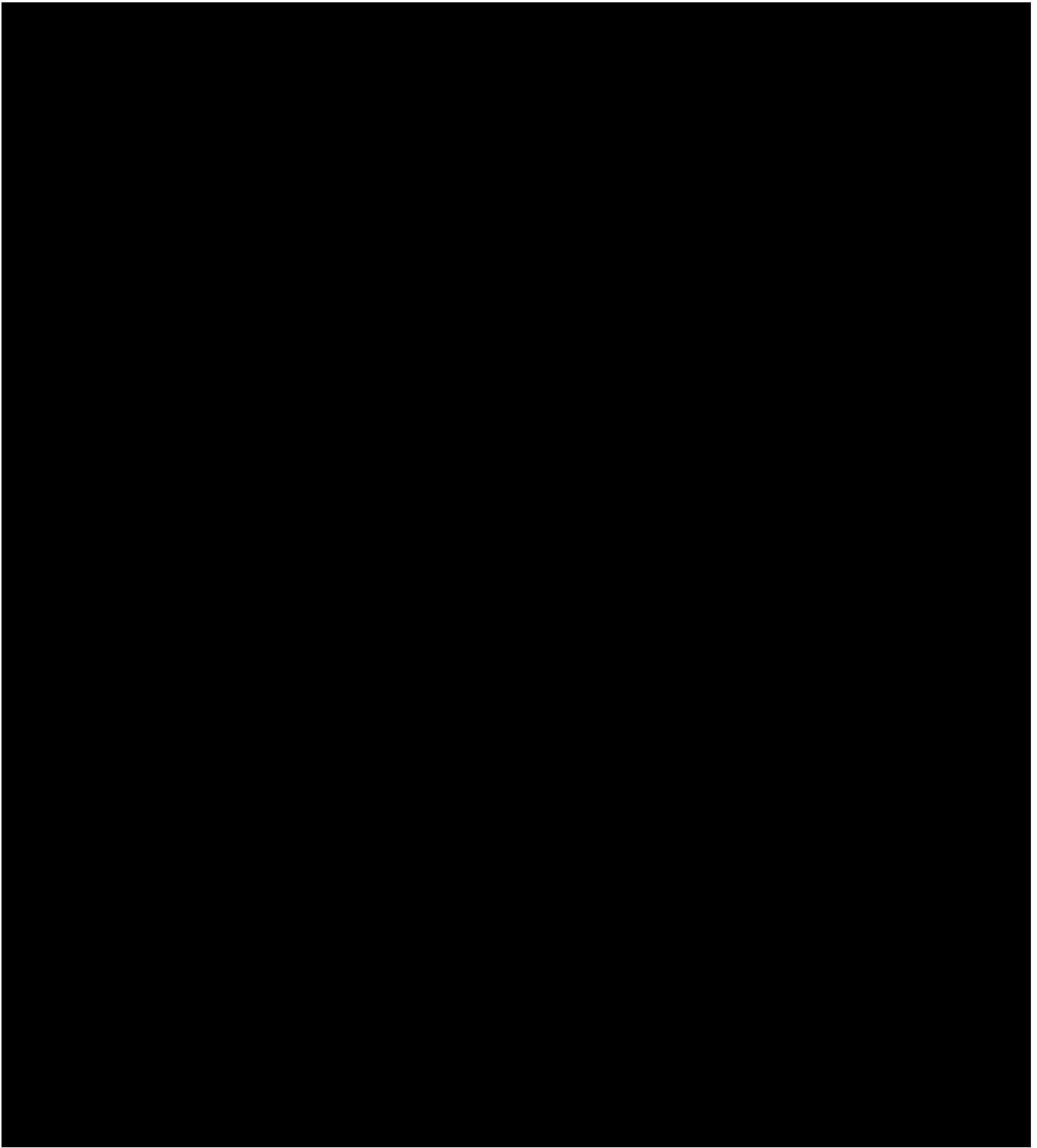
⁹⁵ From public information, I know that on March 29, 2019, approximately two months earlier, two senior members of Congress wrote a letter to the U.S. Secretary of State requesting that he “inform Egyptian authorities that” the sale of Apache helicopters (and other lethal equipment) to Egypt for \$1 billion that had been approved on November 28, 2018 by the State Department, but had not yet been finalized, “not move forward until [Plaintiff’s] case is satisfactorily resolved. To do otherwise would be seen as rewarding the Egyptian armed forces with more of the same lethal equipment that they used to recklessly injure an American tourist, despite the Egyptian government’s failure to provide her fair compensation.”

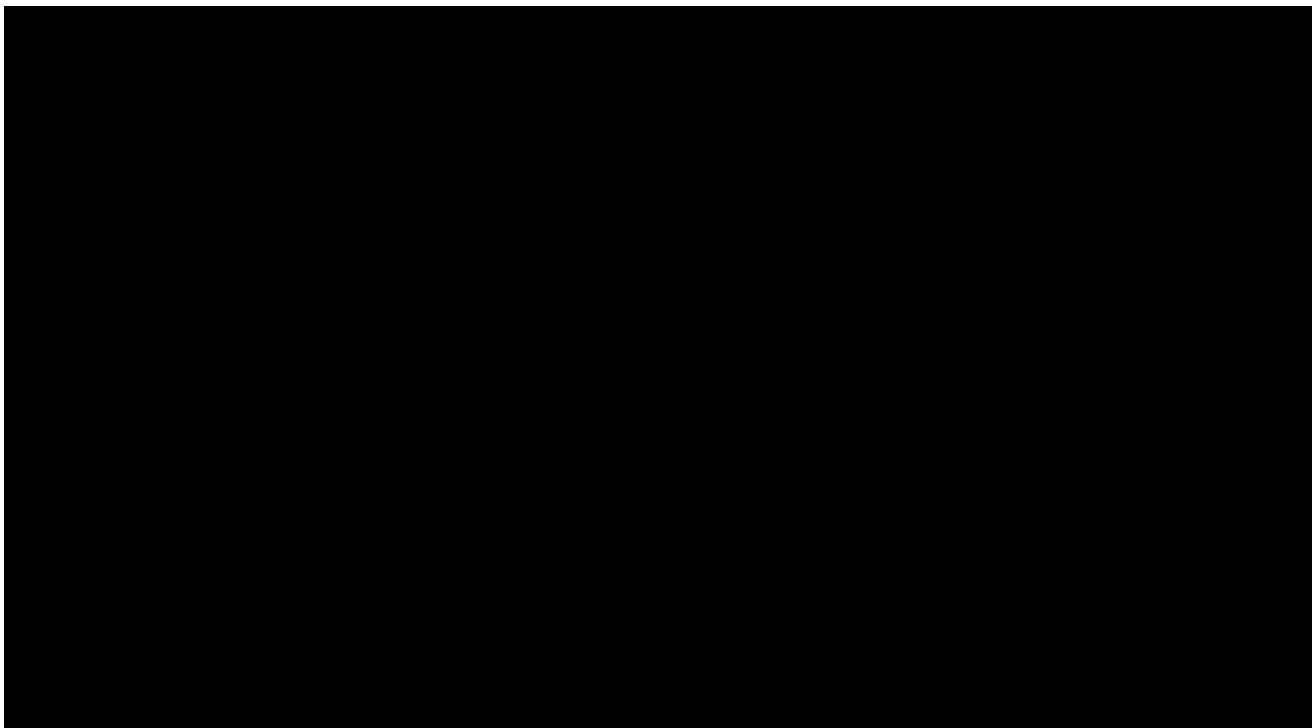
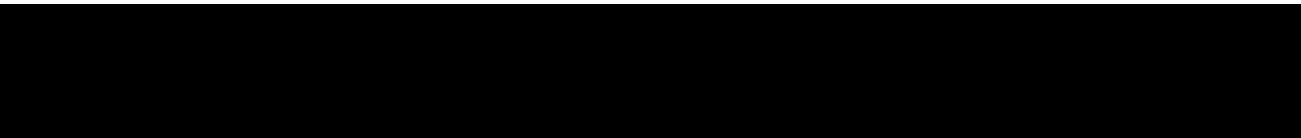






A solid black rectangular block redacts the signature and any associated text or dates that would typically appear in this section of a legal document.

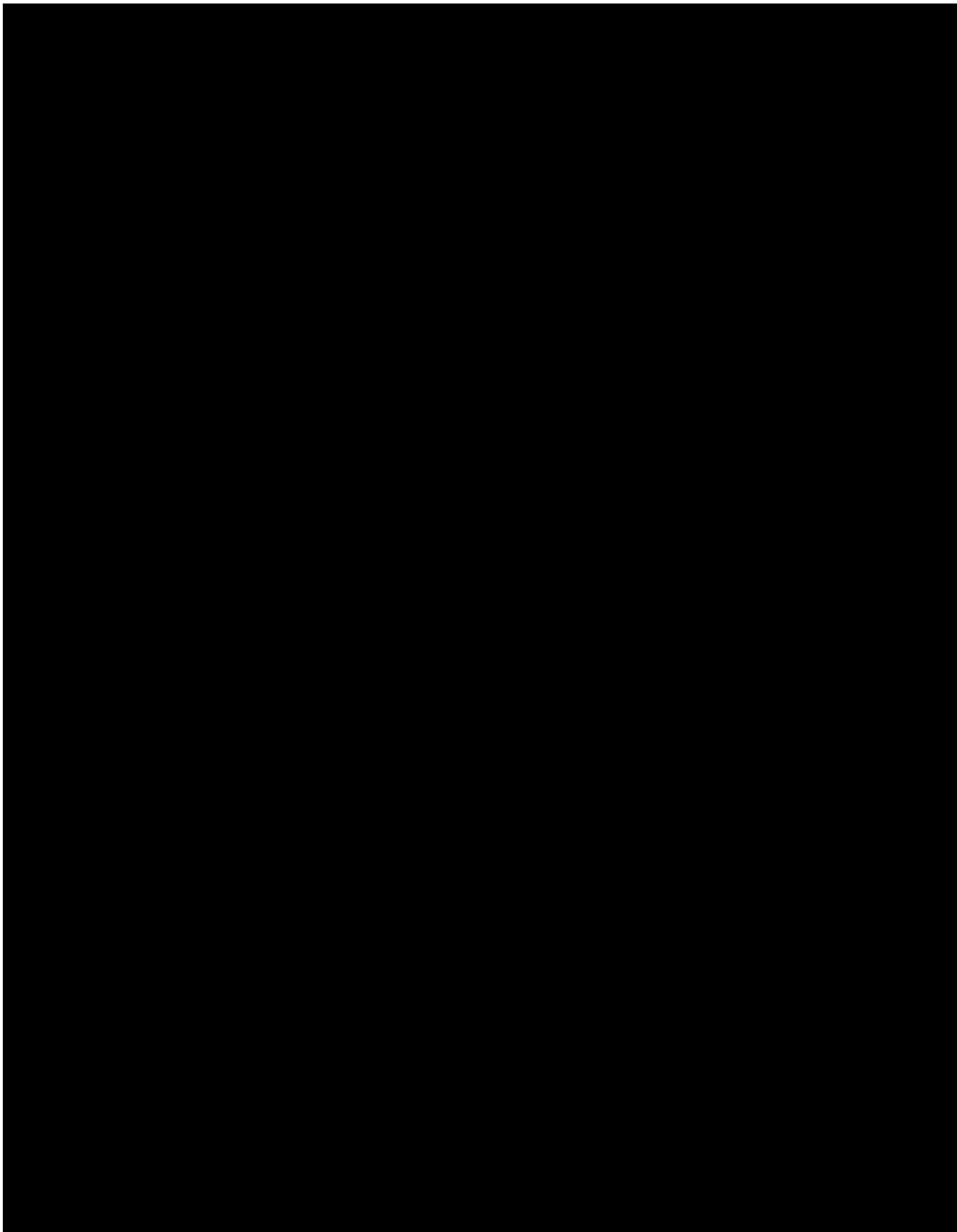


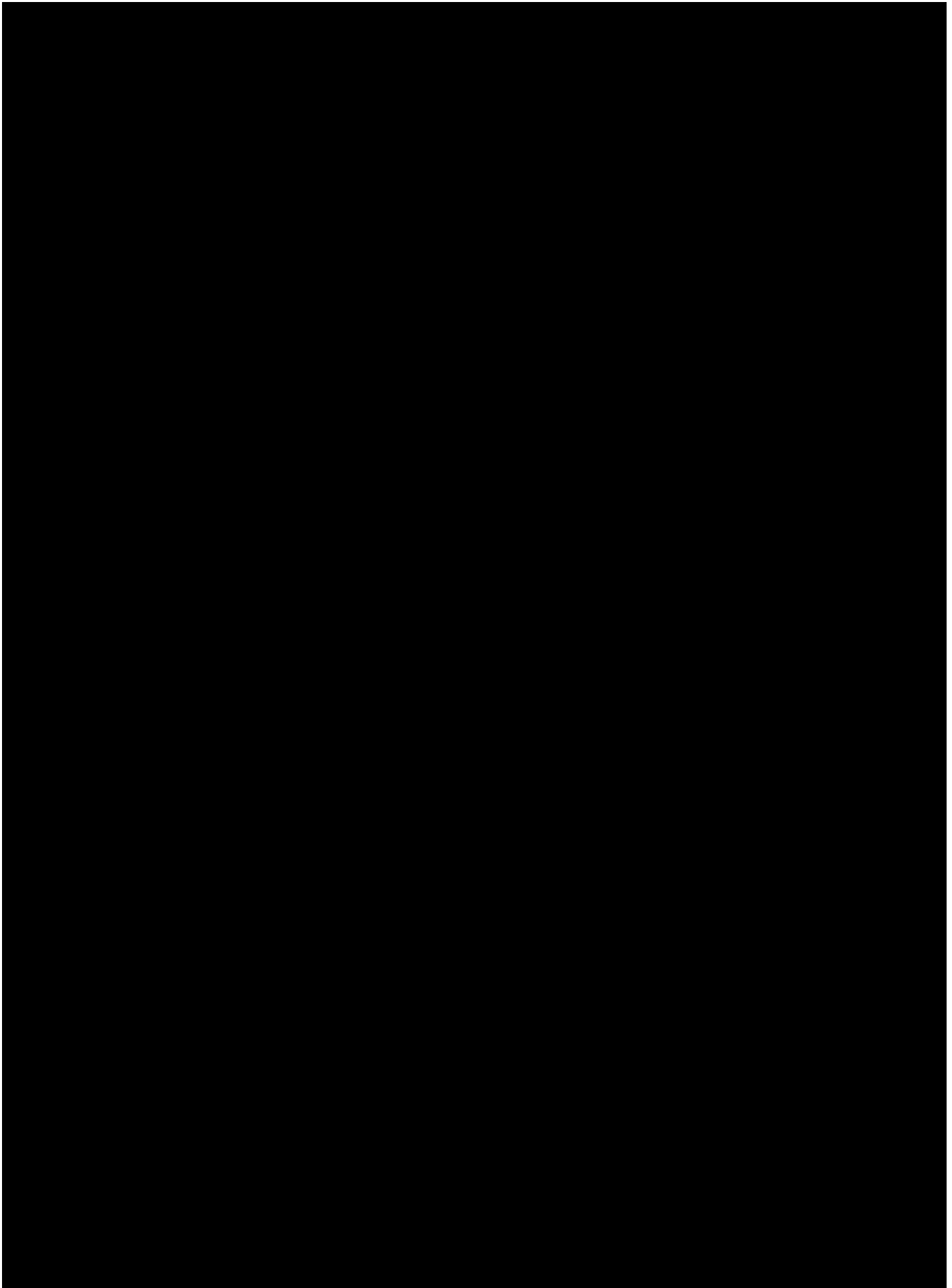


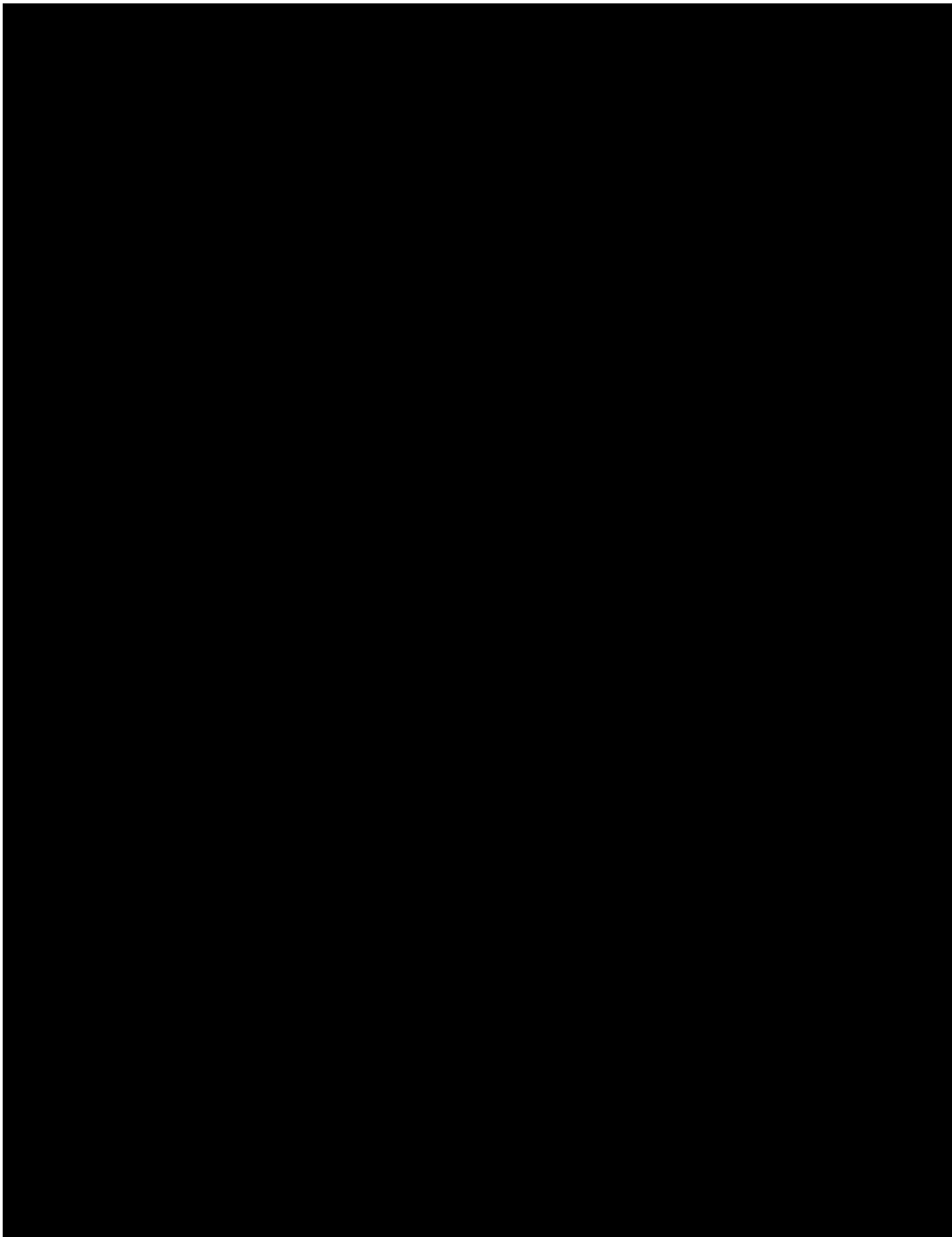
c. On July 26, 2018—*i.e.*, the day after the scheduled meeting with Egyptian officials described in paragraph 79.b, above—Arslanian texted Hana, “I am going to sign off this sale to Egypt today. Egypt: 46,000 120MM Target Practice Rounds and 10,000 Rounds Tank Ammunition: \$99 million NOTE: These tank rounds are for tanks they have had for many years. They are using these in the Sinai for the counter-terrorism campaign.” Based on the context, I believe that this text represented Arslanian forwarding Menendez’s words to Hana. Later that day, Hana forwarded that text to an Egyptian official,¹⁰⁰ who replied with a thumbs-up emoji.¹⁰¹

¹⁰⁰ This individual was among those Egyptian officials referred to in the Arslanian iCloud Account as attending the March and June 2018 meetings referred to in paragraphs 79.a and 79.b, above.

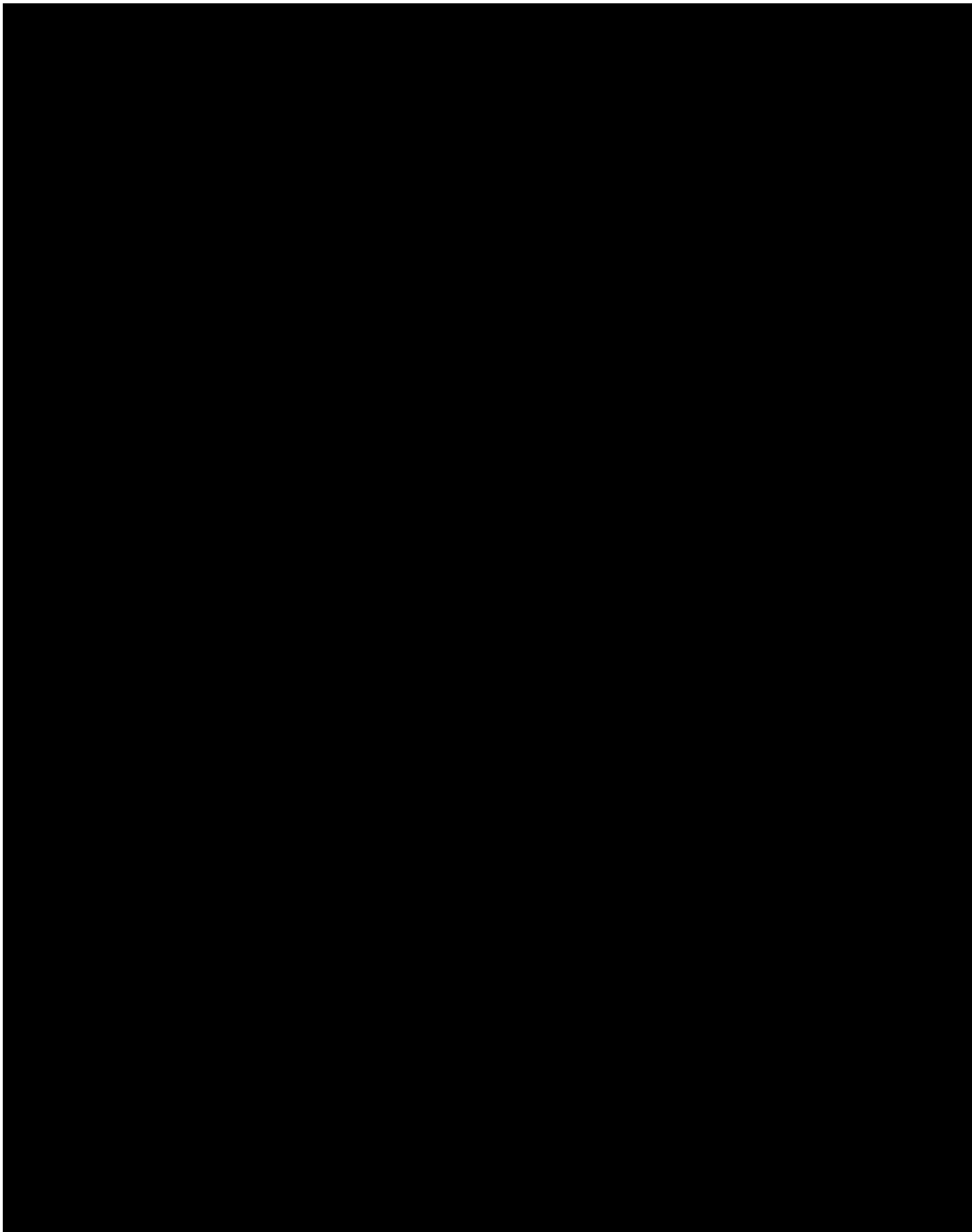
¹⁰¹ Based on my review of public information, I have learned that on or about September 18, 2018, the State Department made a determination approving a possible Foreign Military Sale to Egypt of forty-six thousand (46,000) M831A1 and M865 rounds and ten thousand (10,000) APFSDS-T rounds for an estimated cost of \$99 million, which corresponds to the amount of munitions and



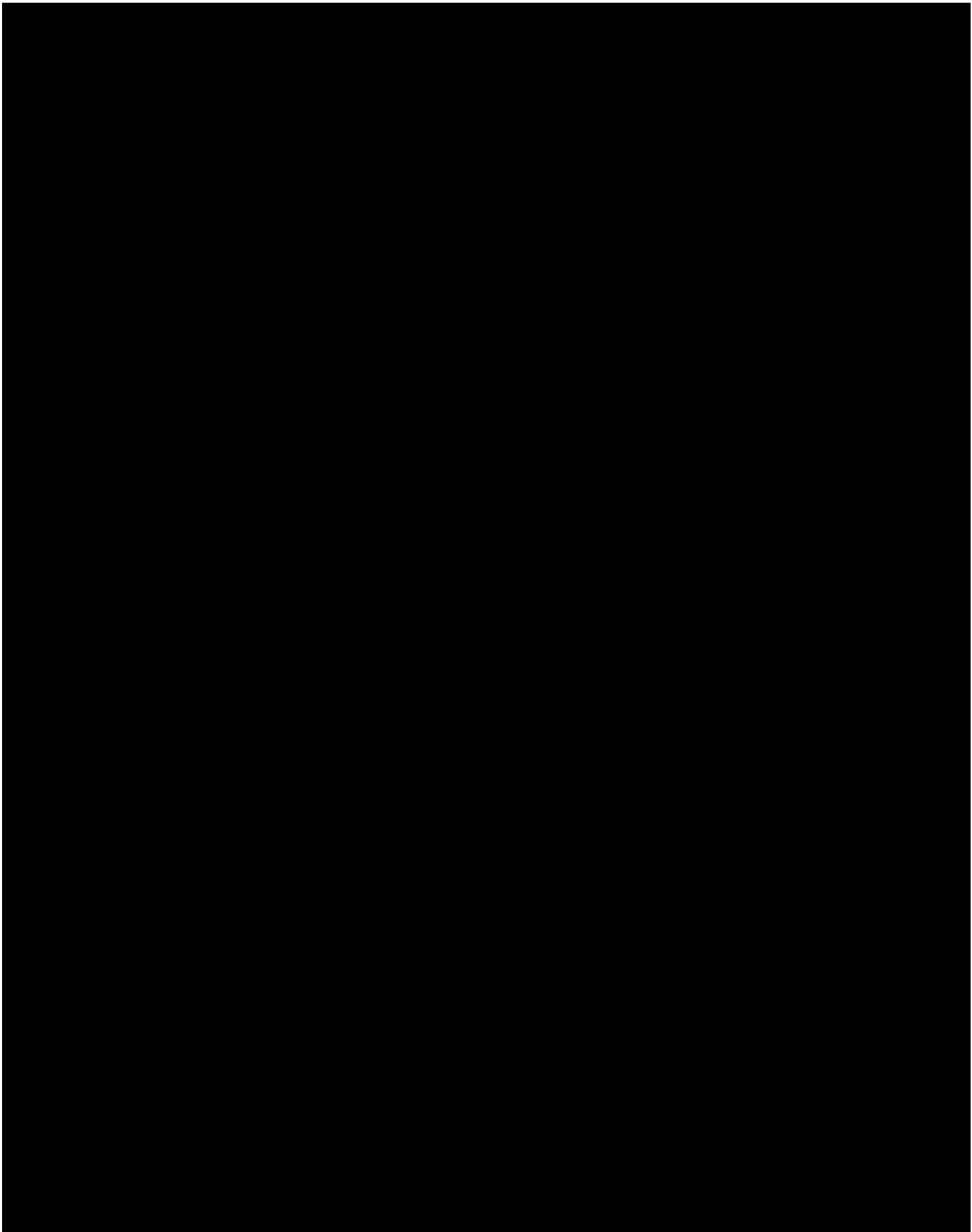




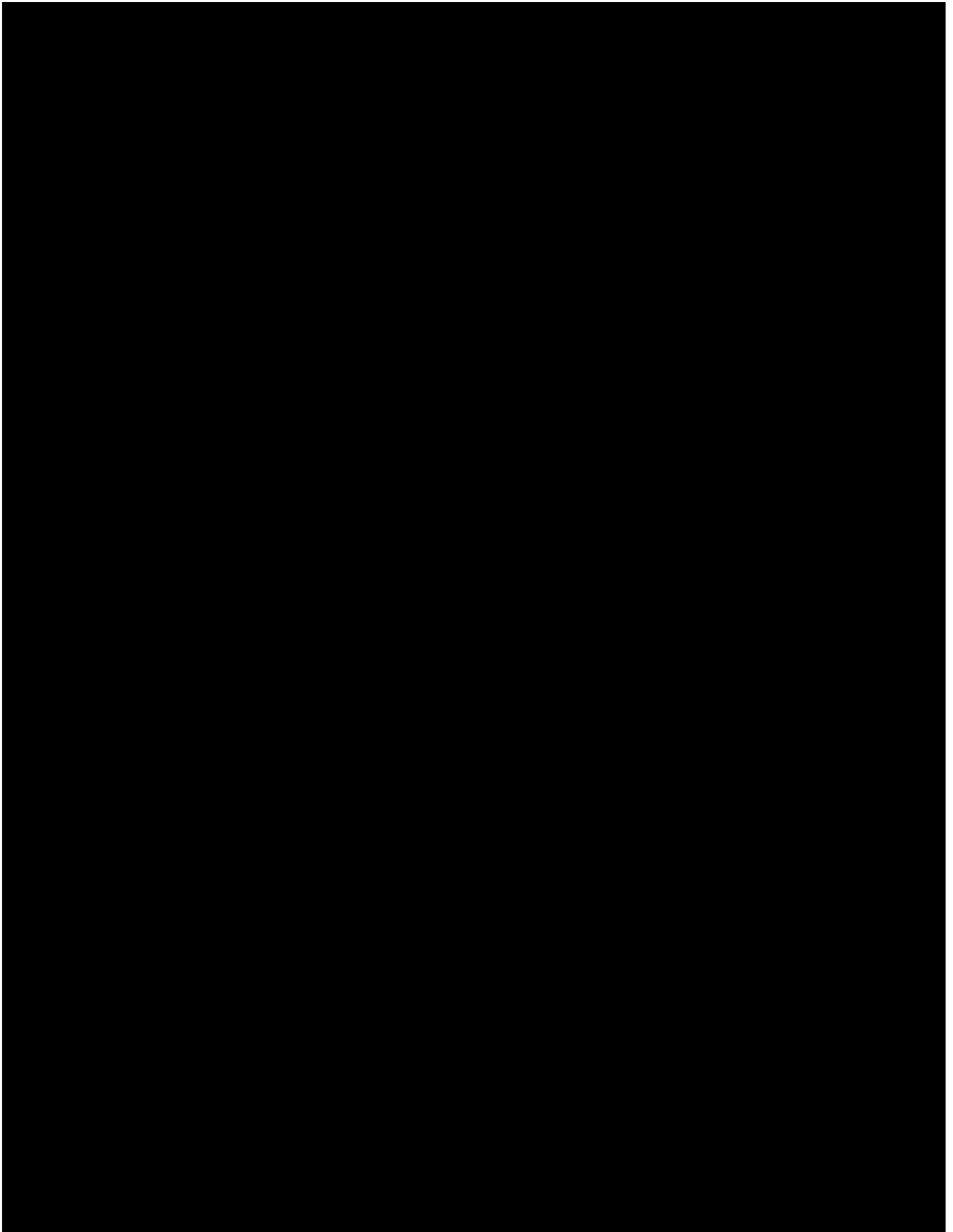
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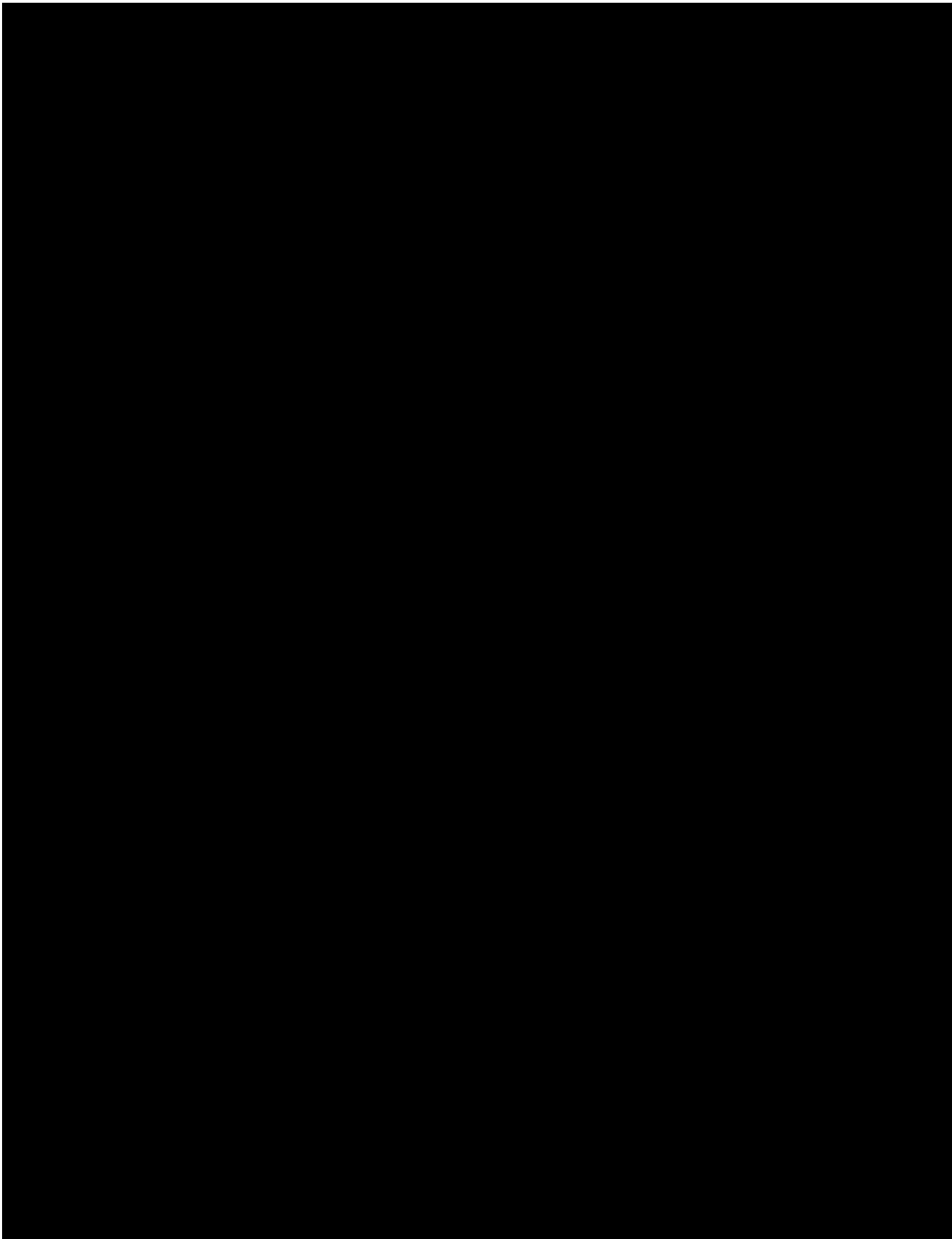


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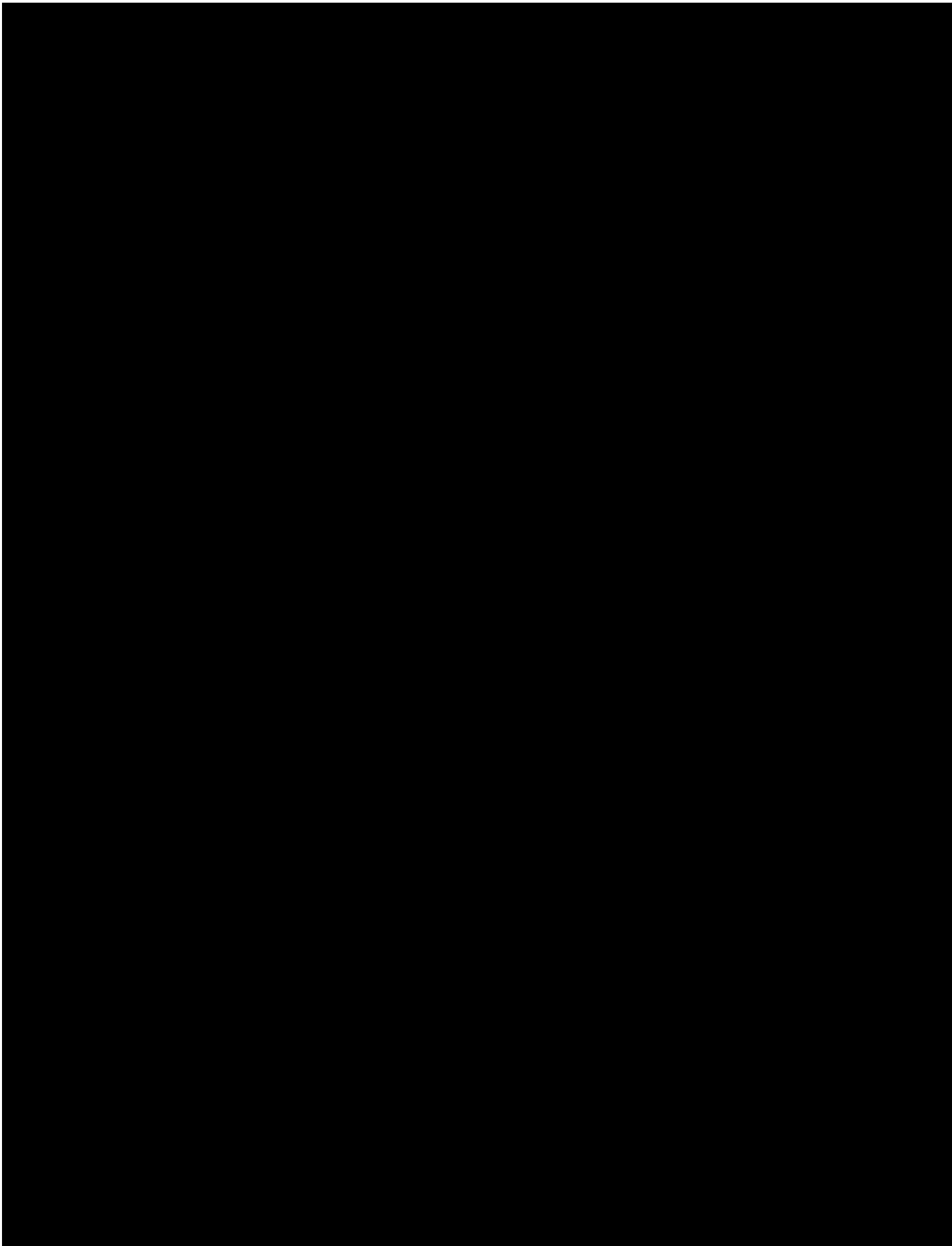


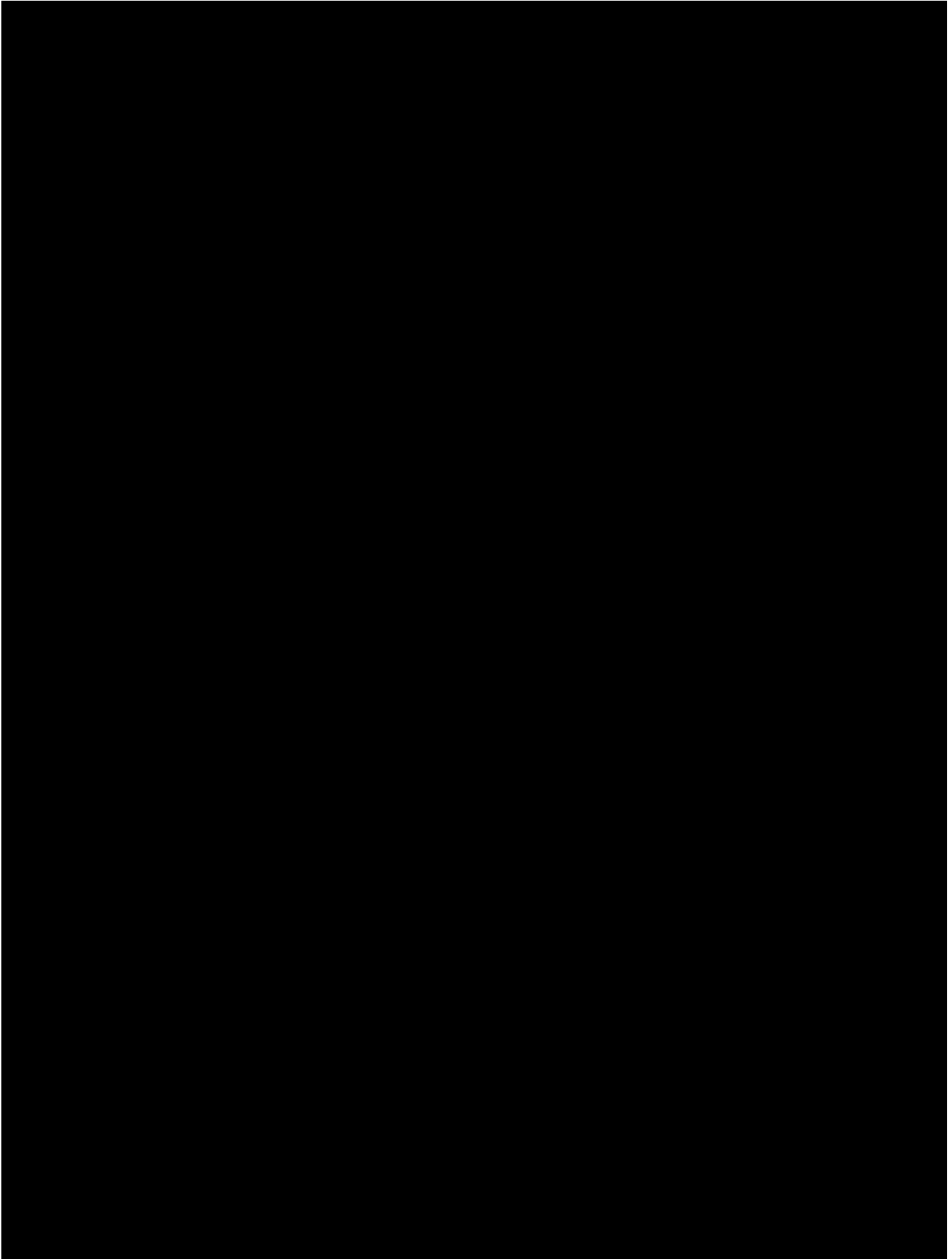
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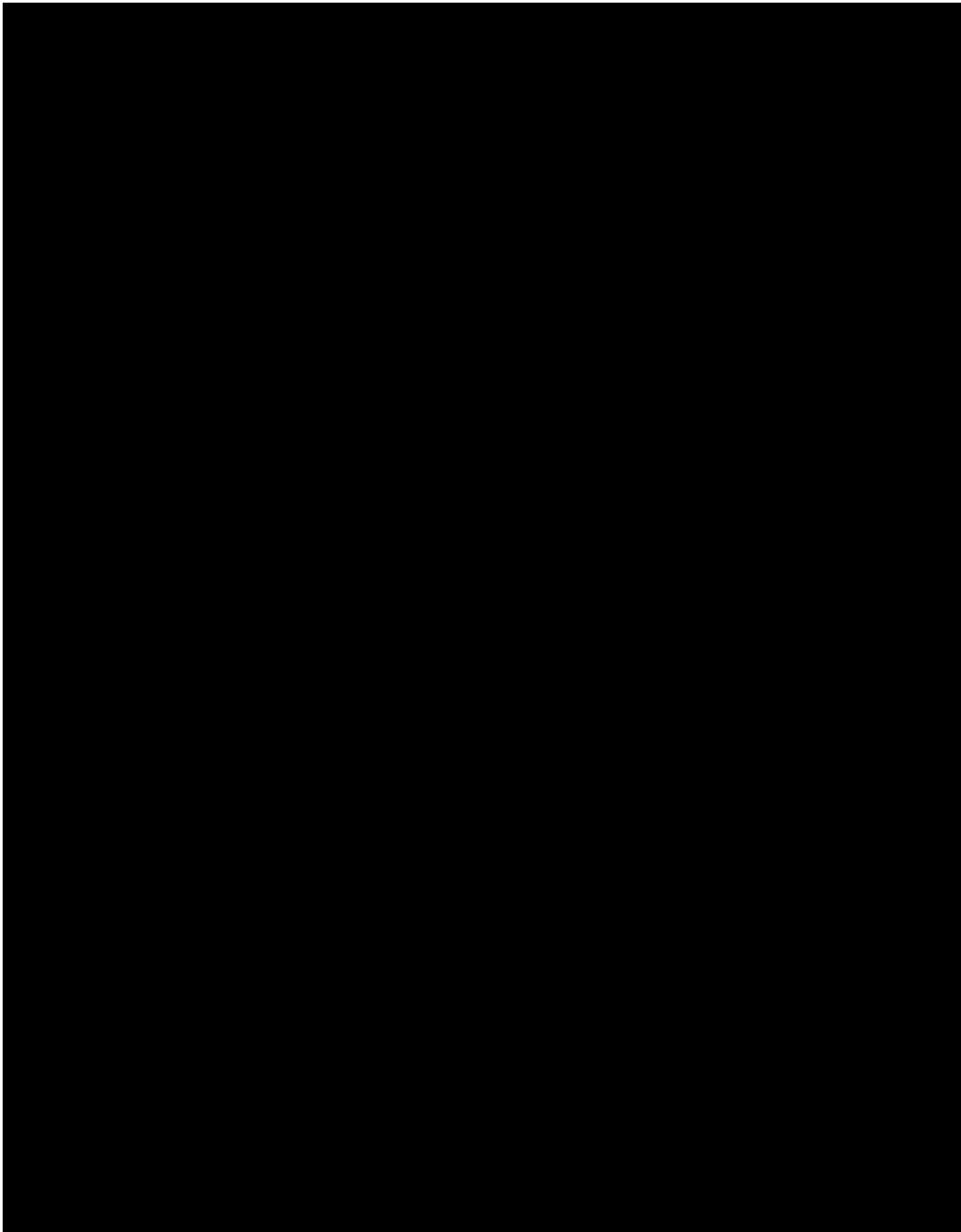


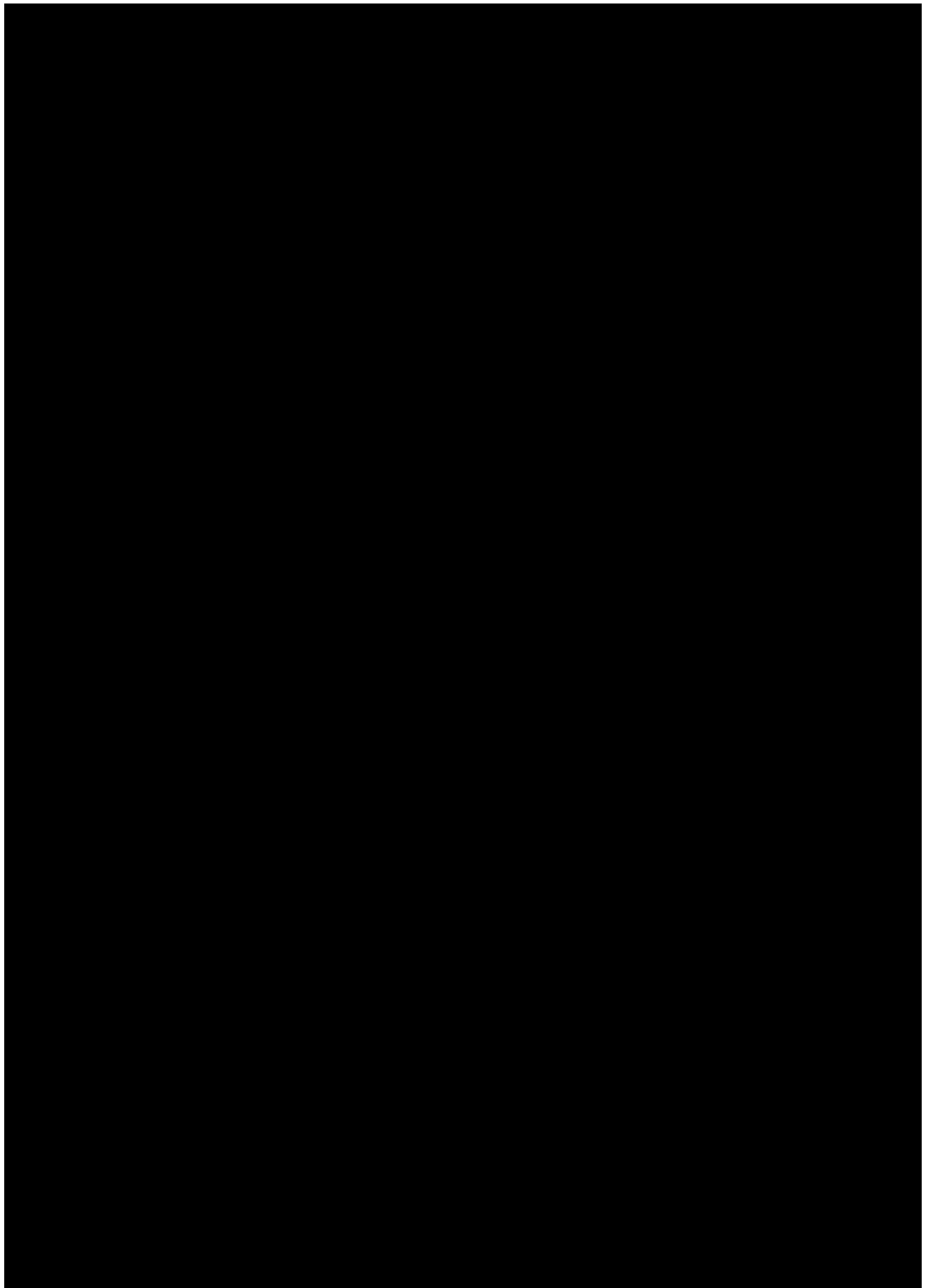
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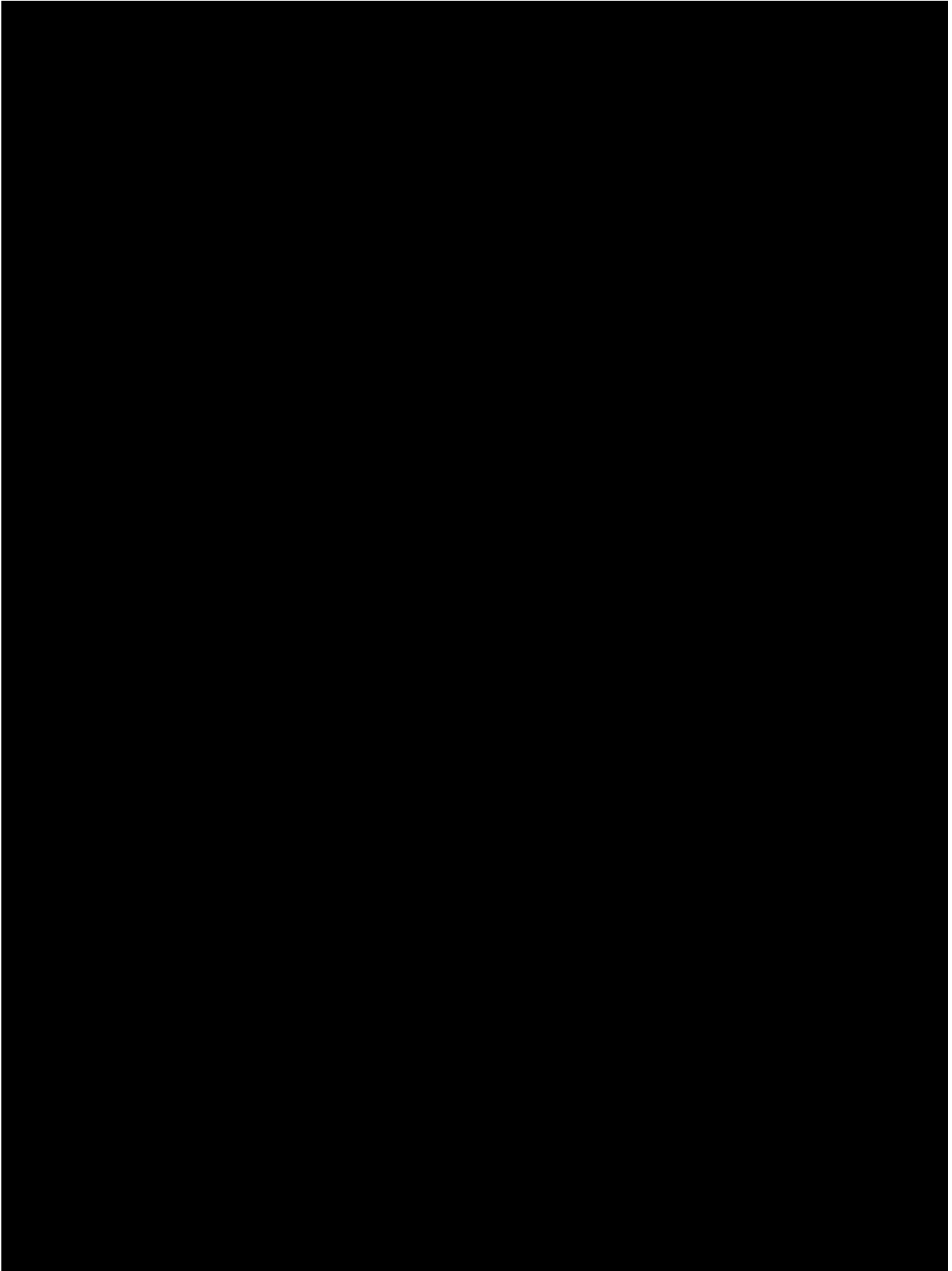


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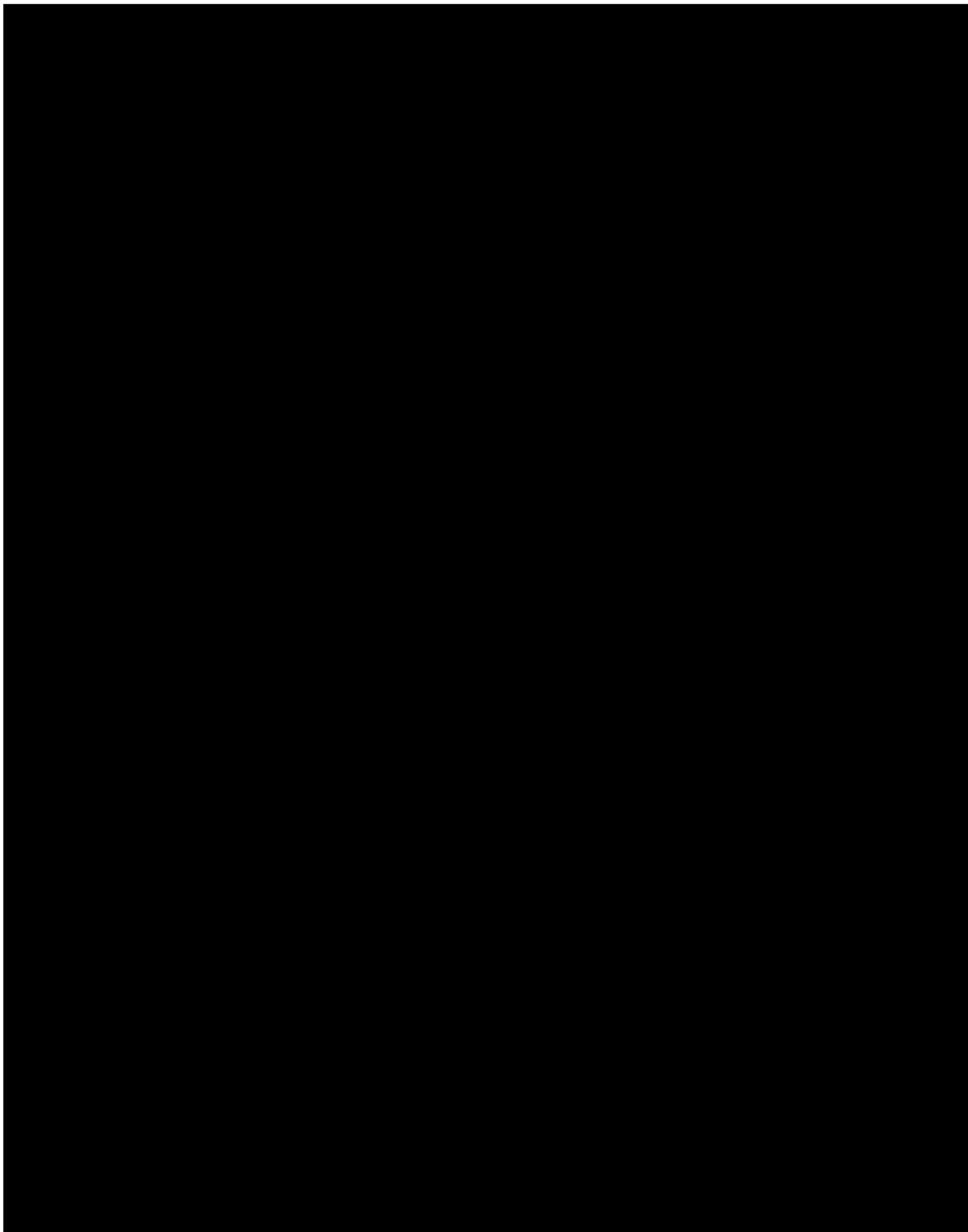


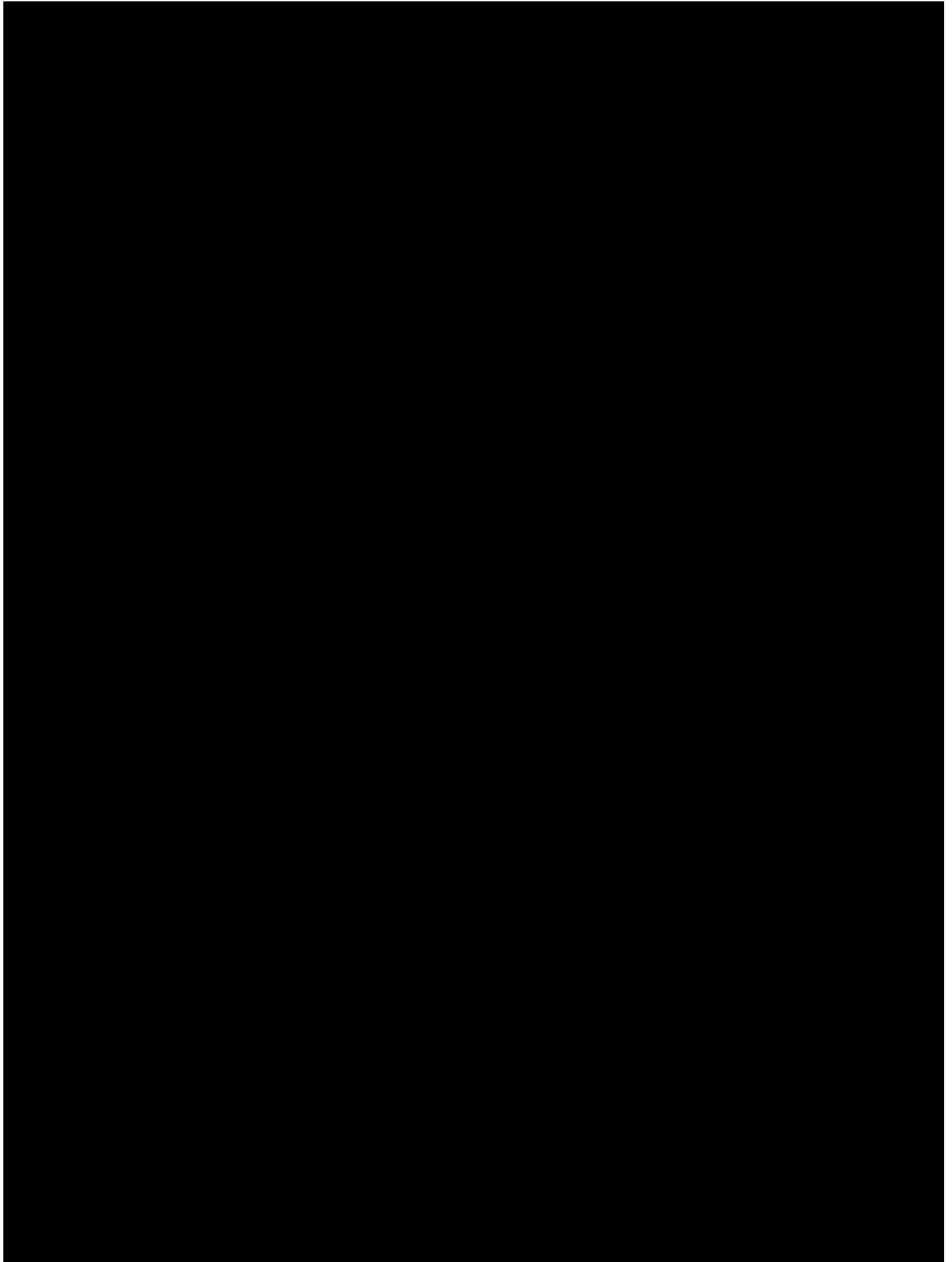


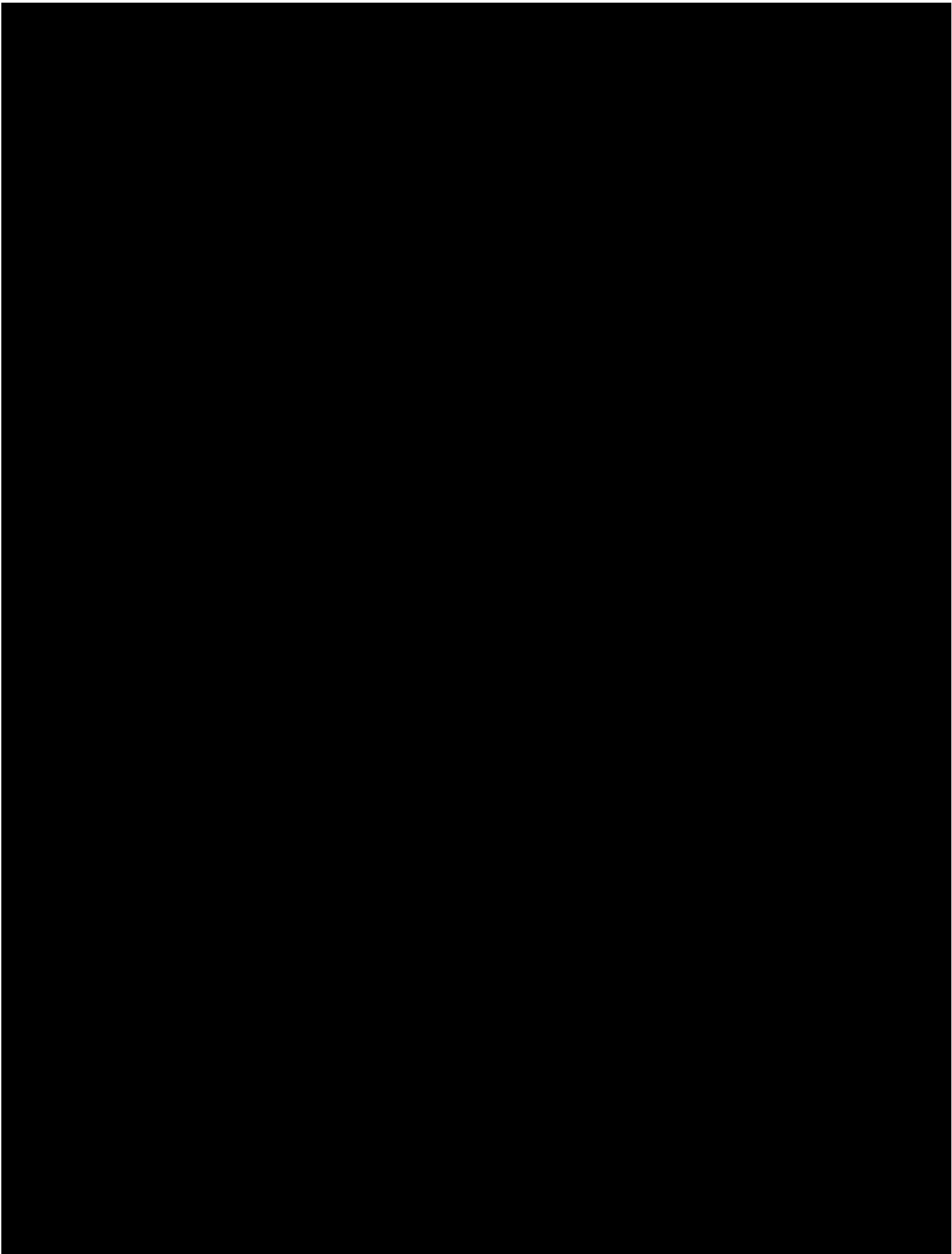
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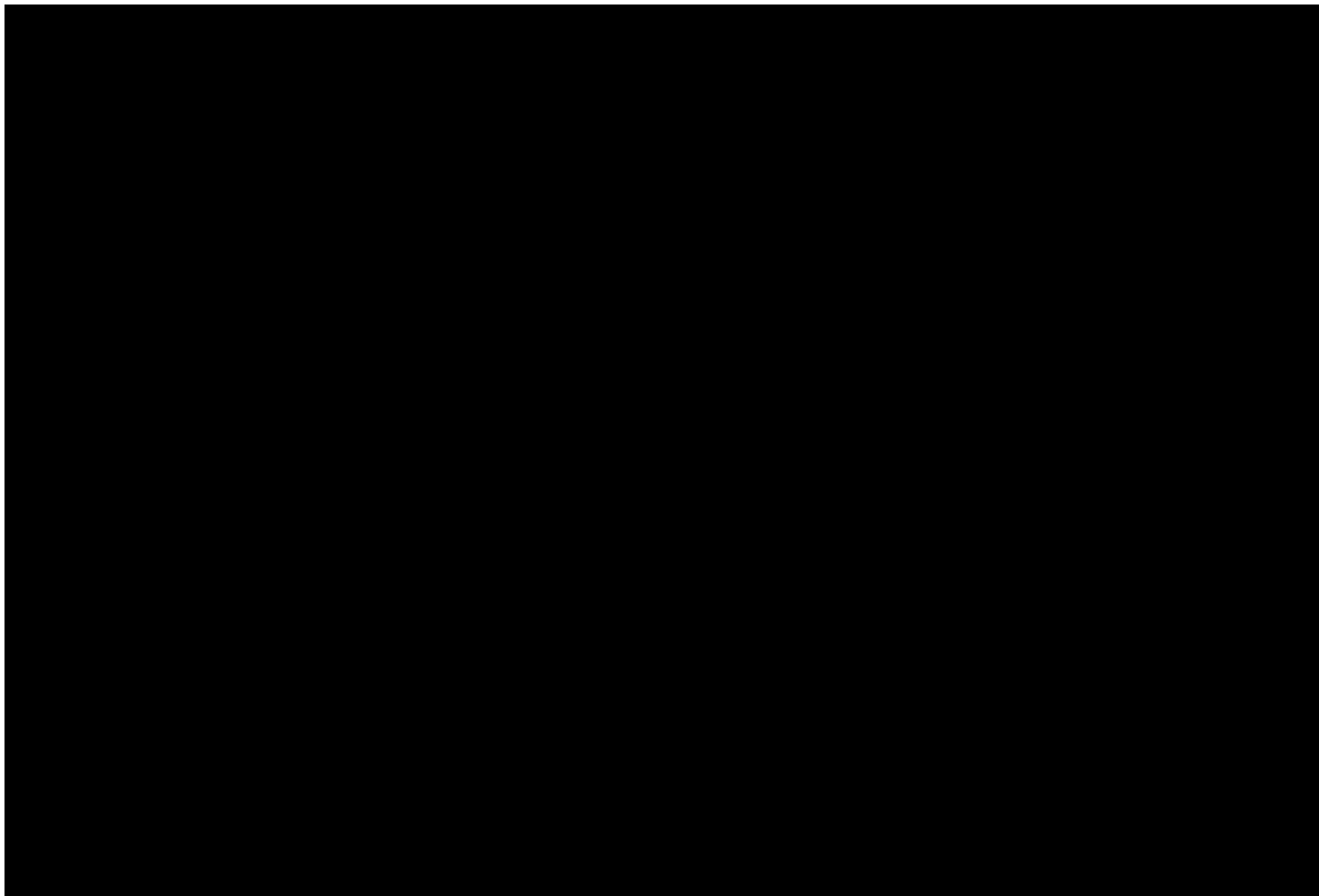
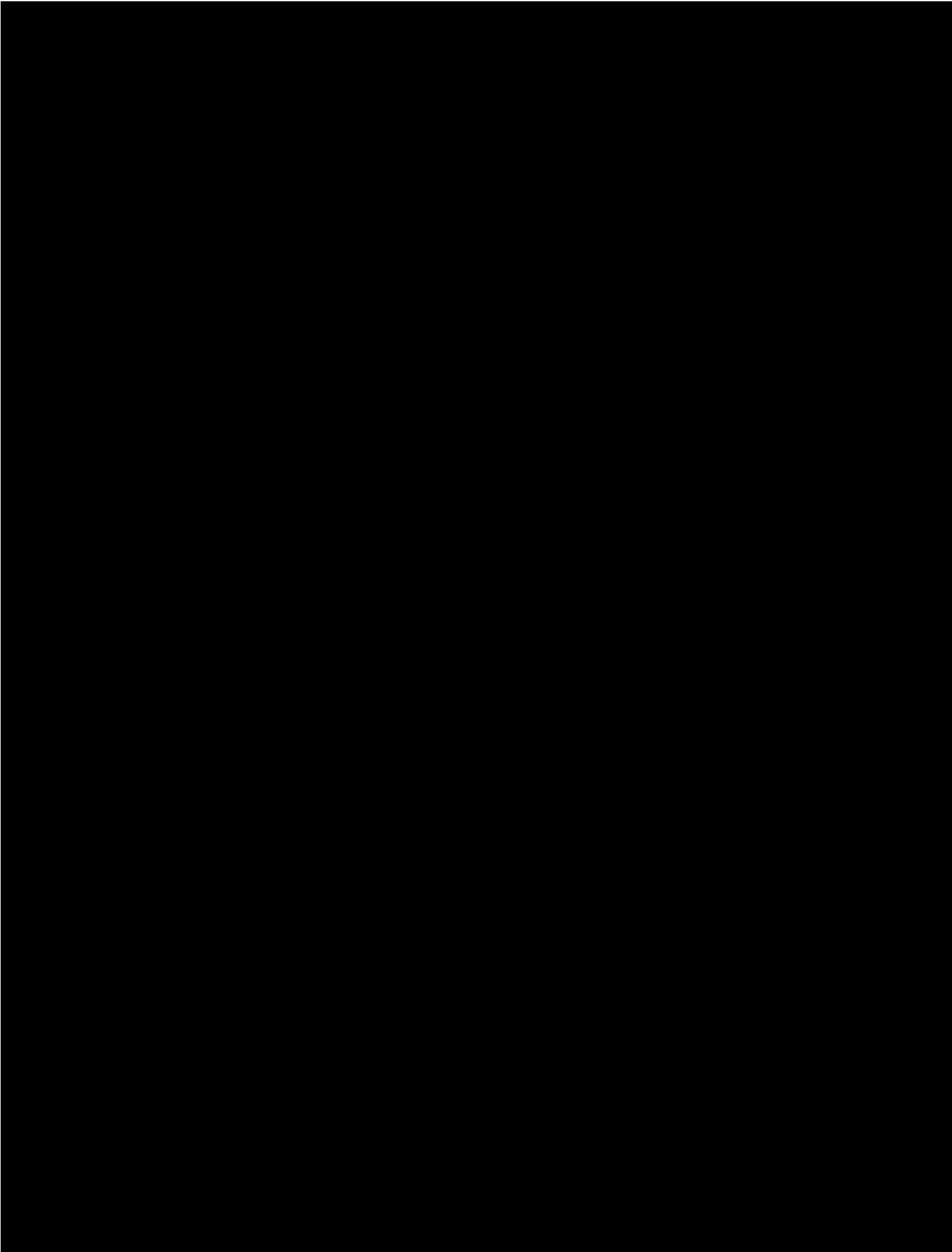
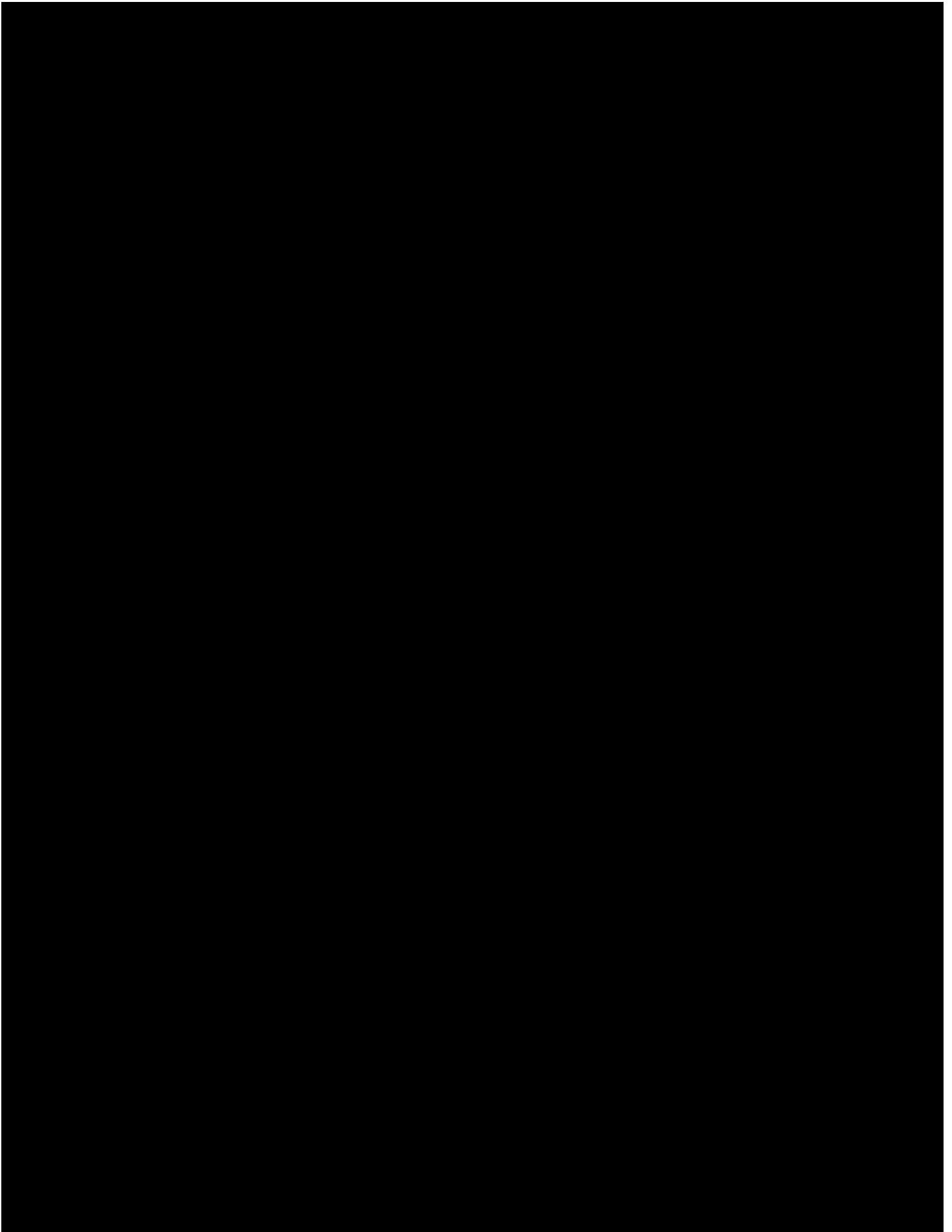
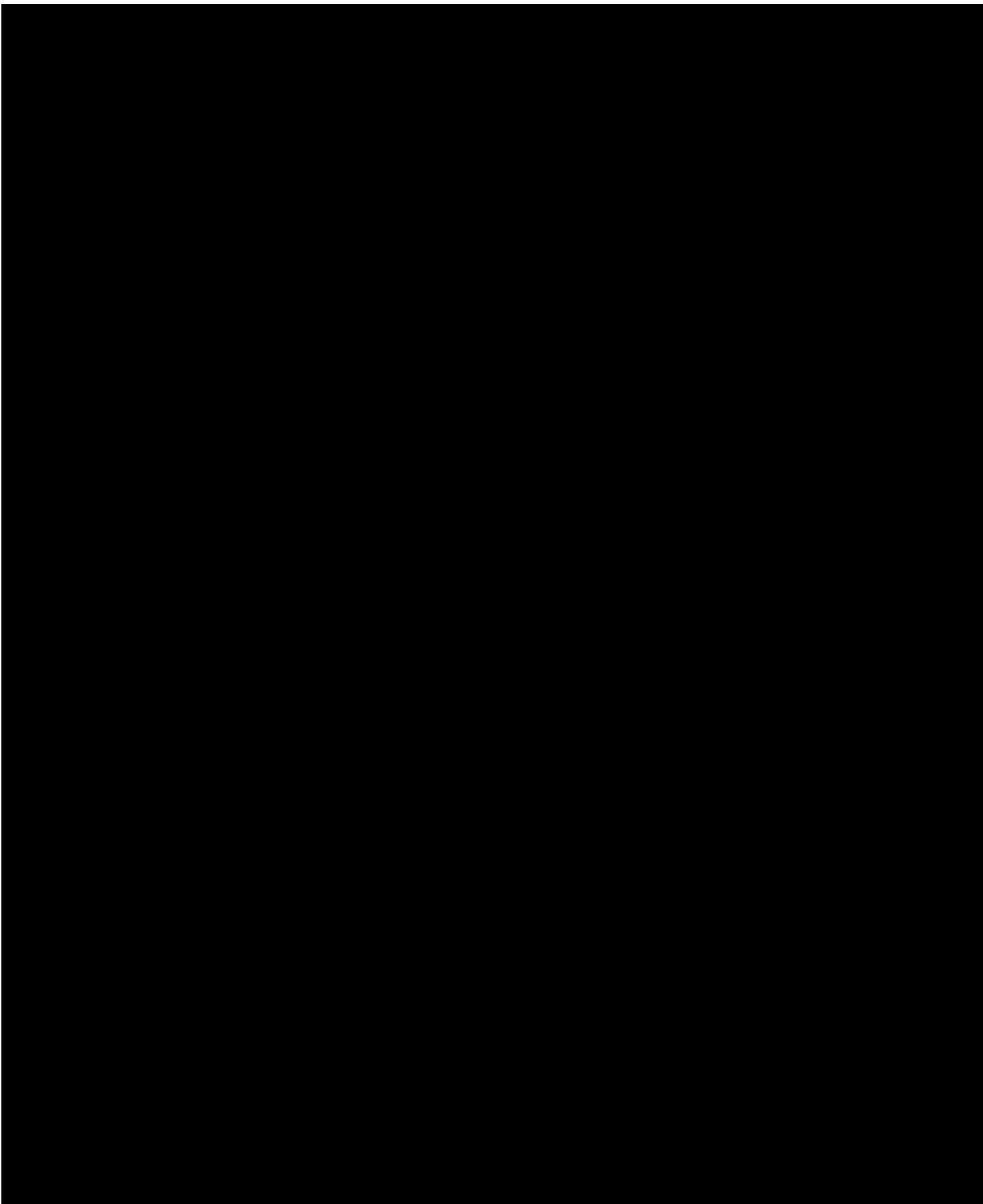


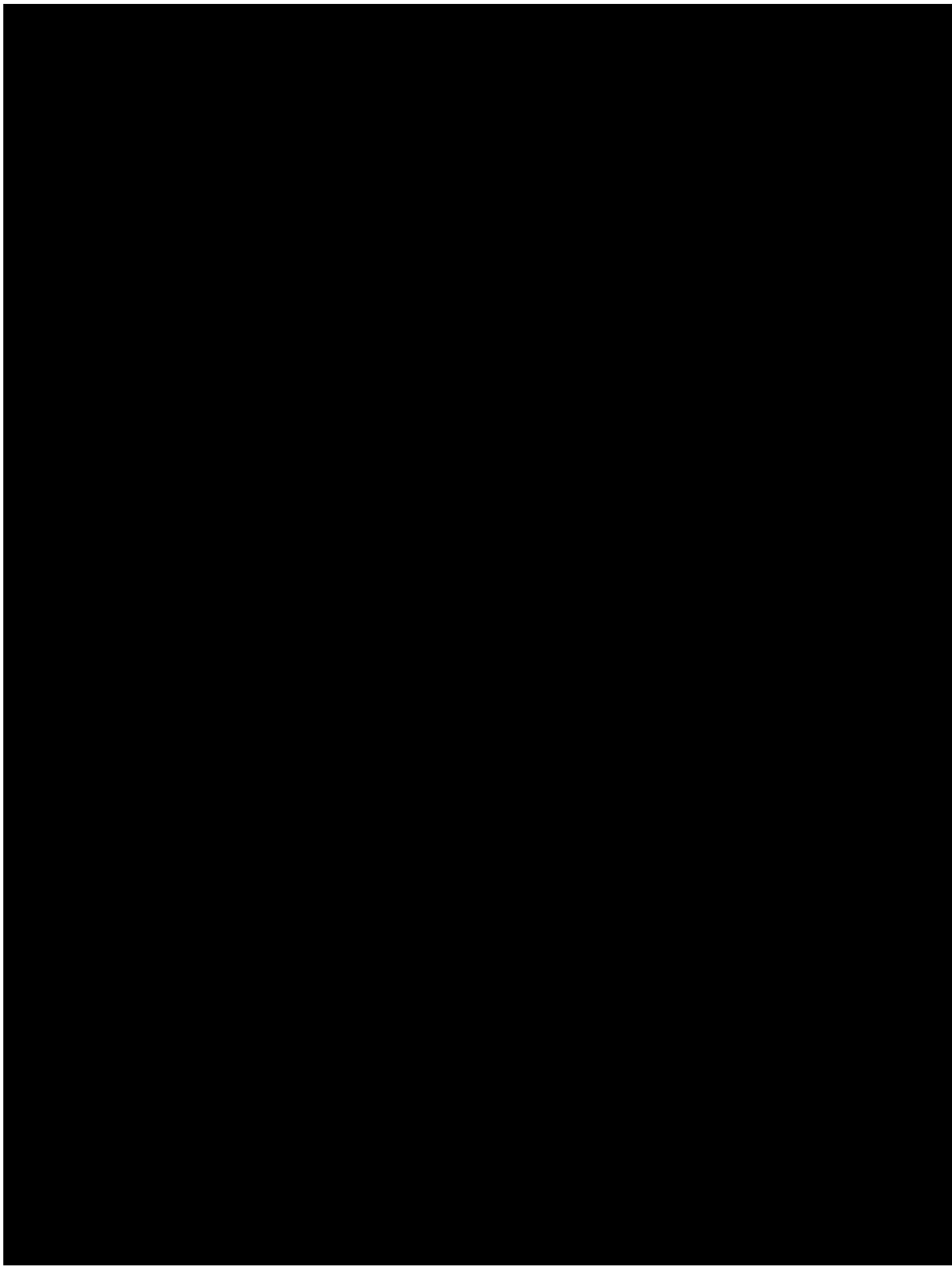
Exhibit A

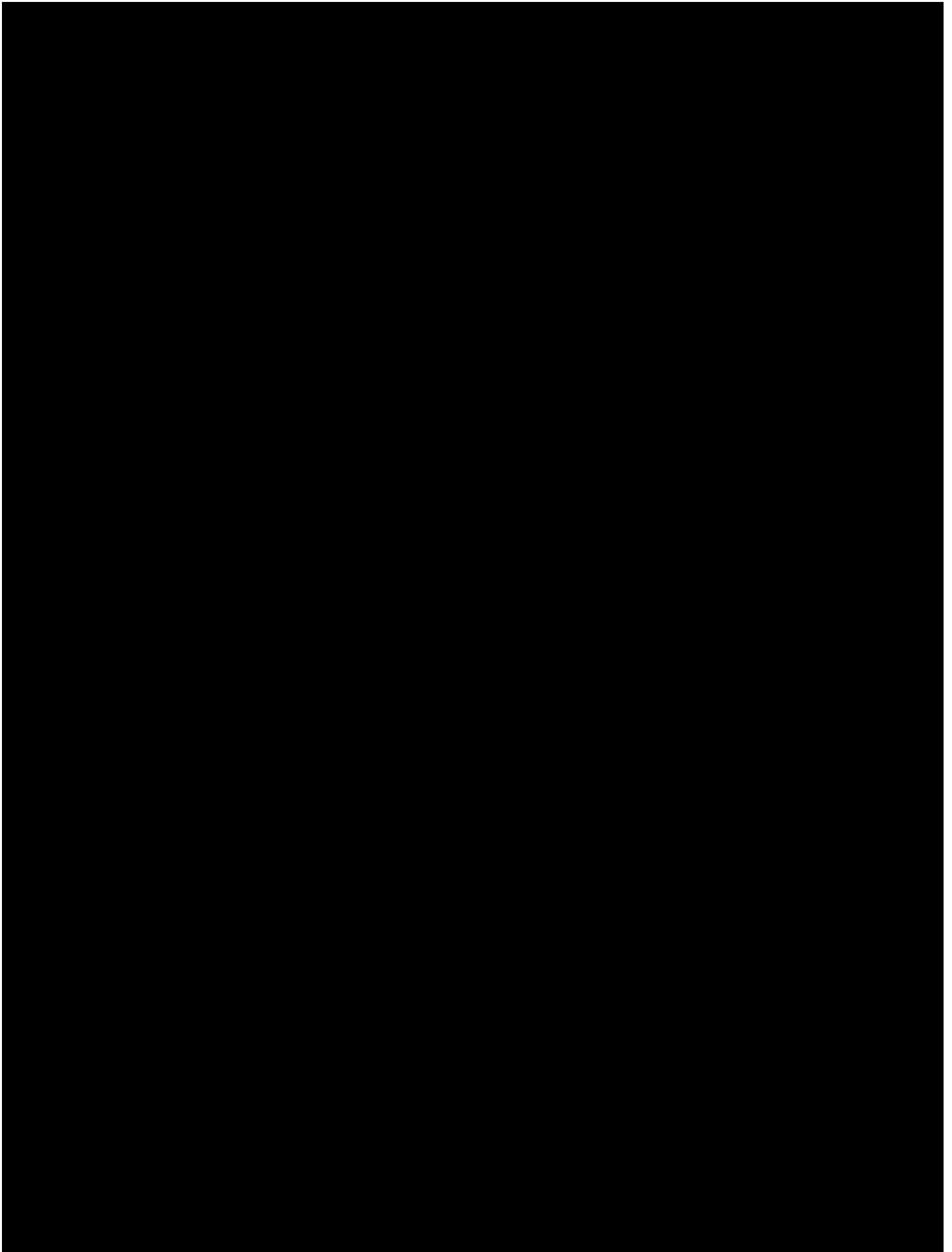


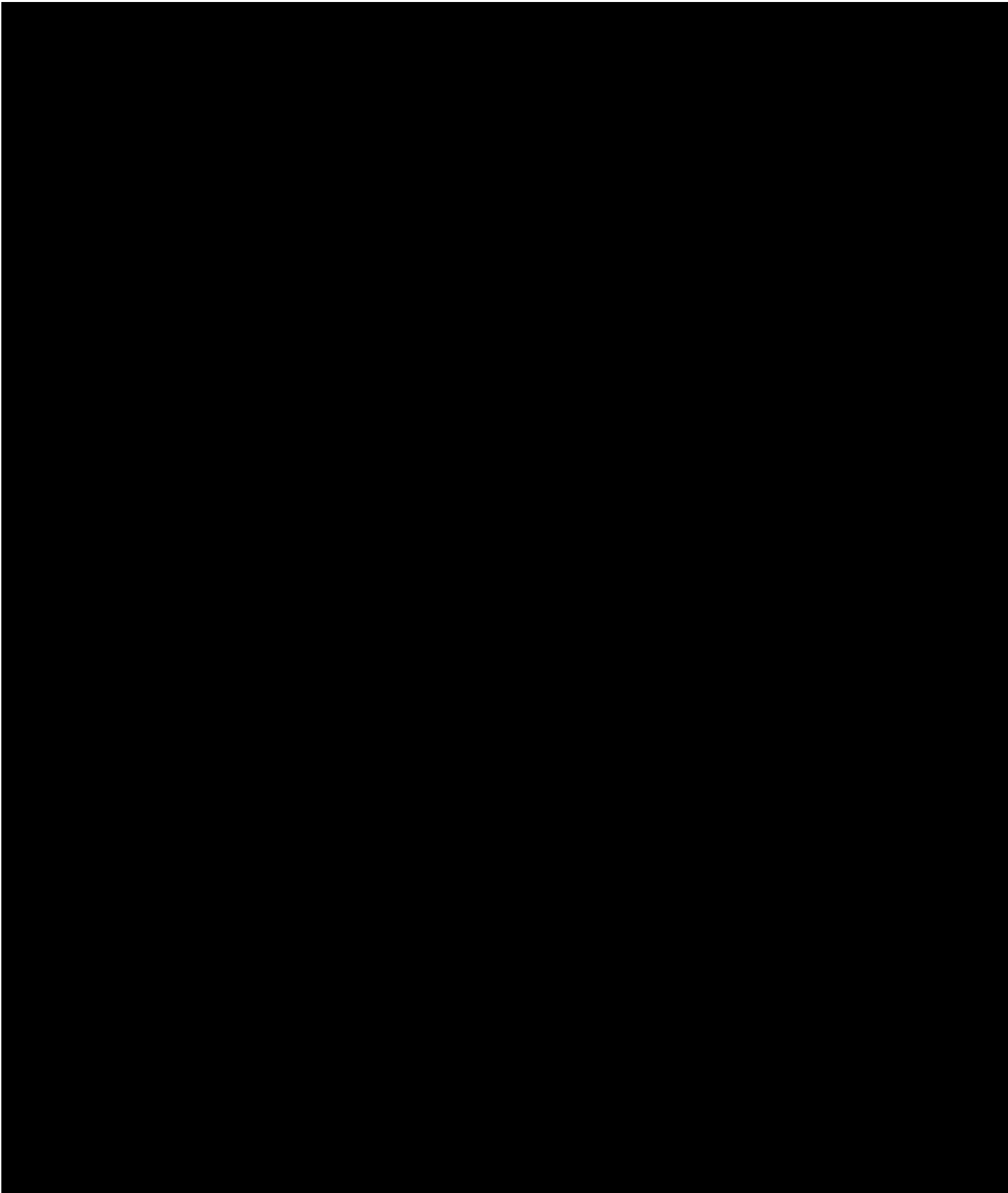




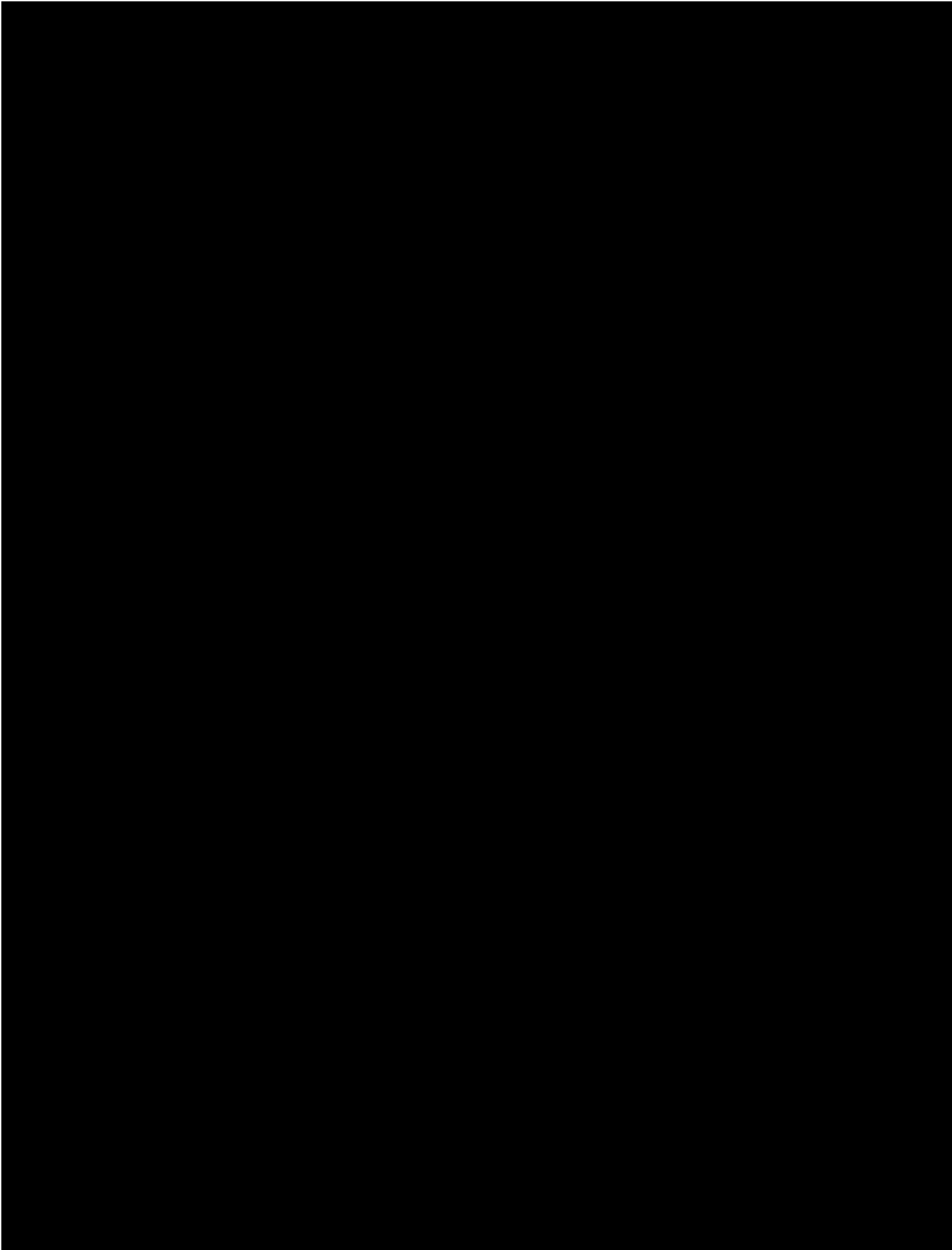
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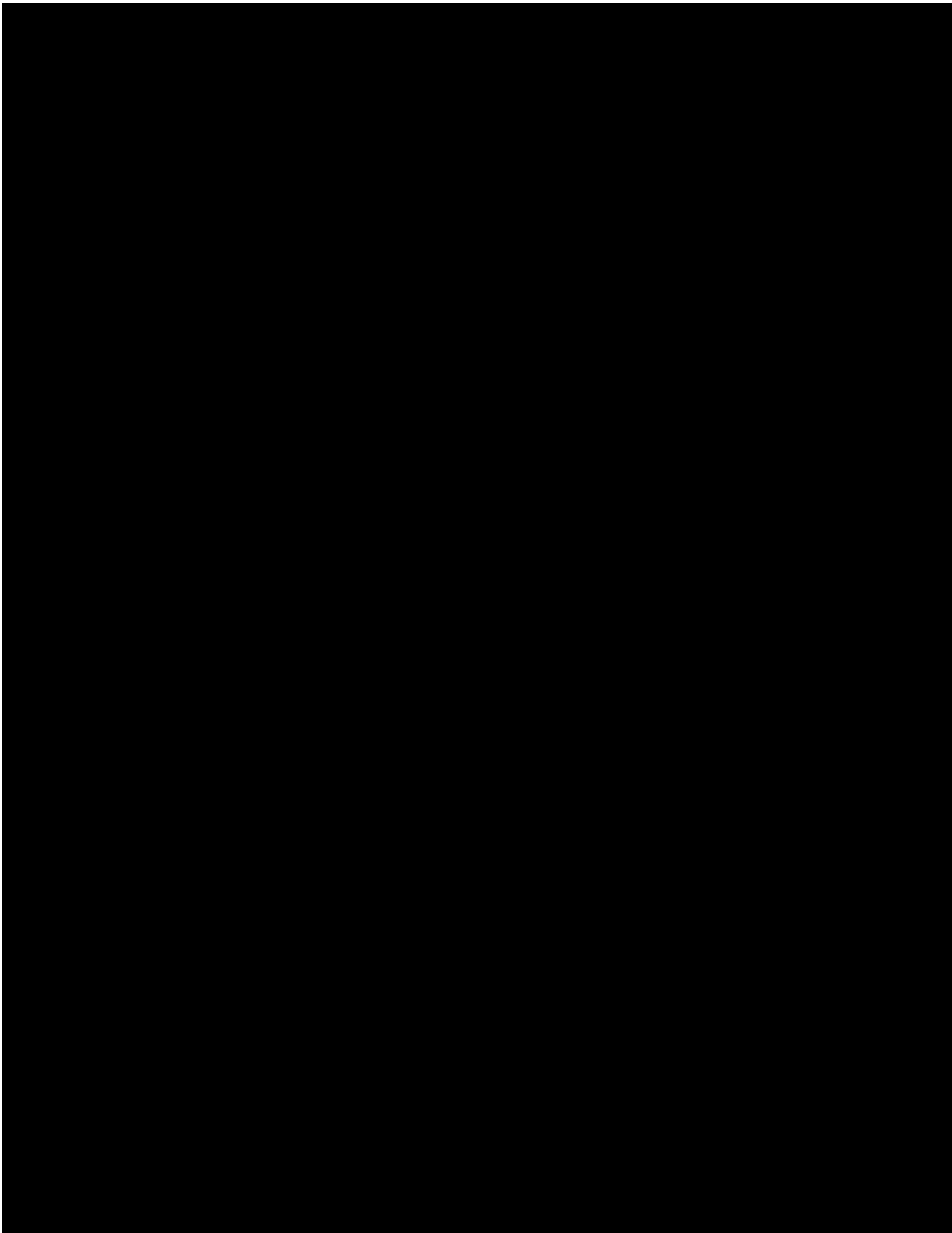




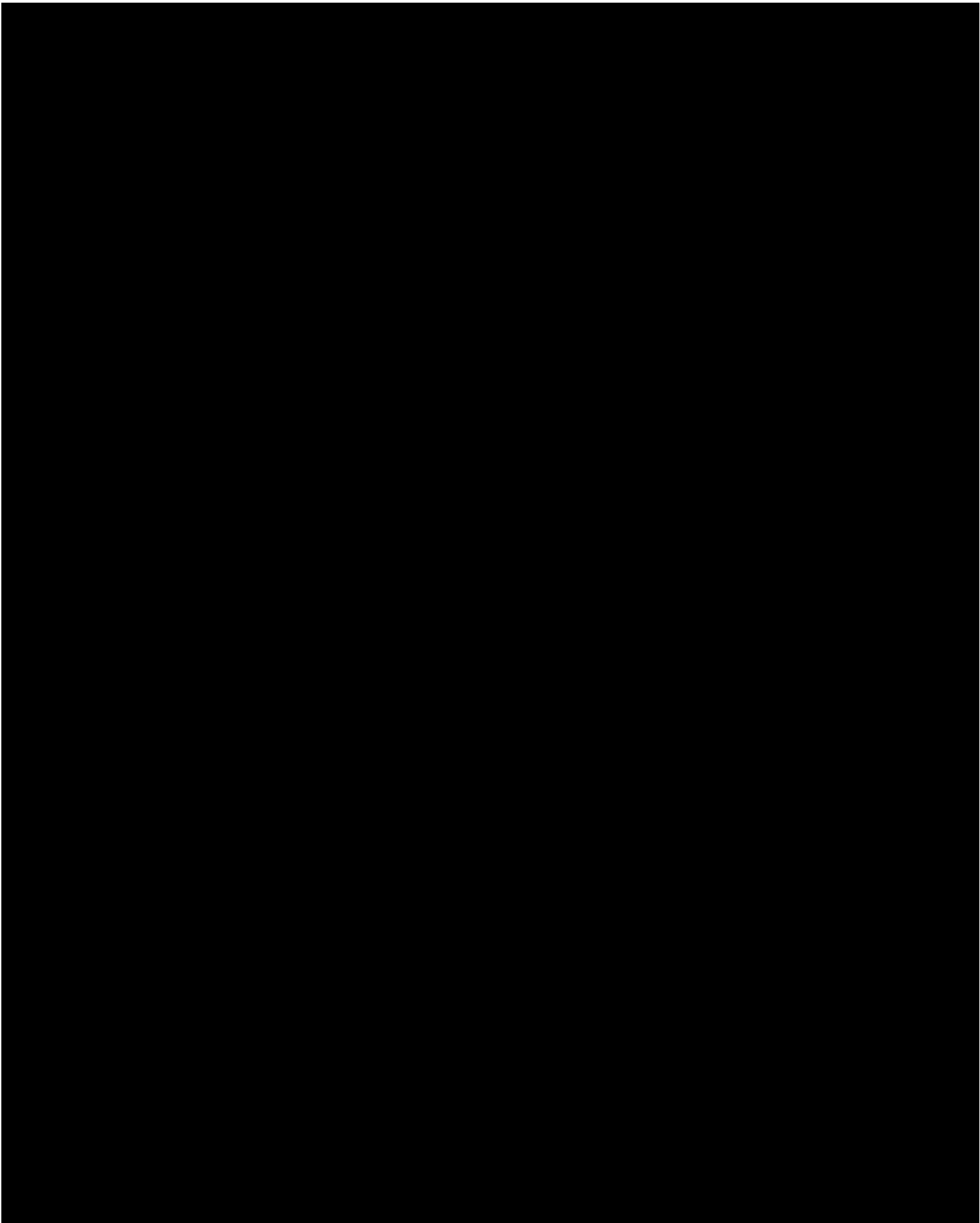
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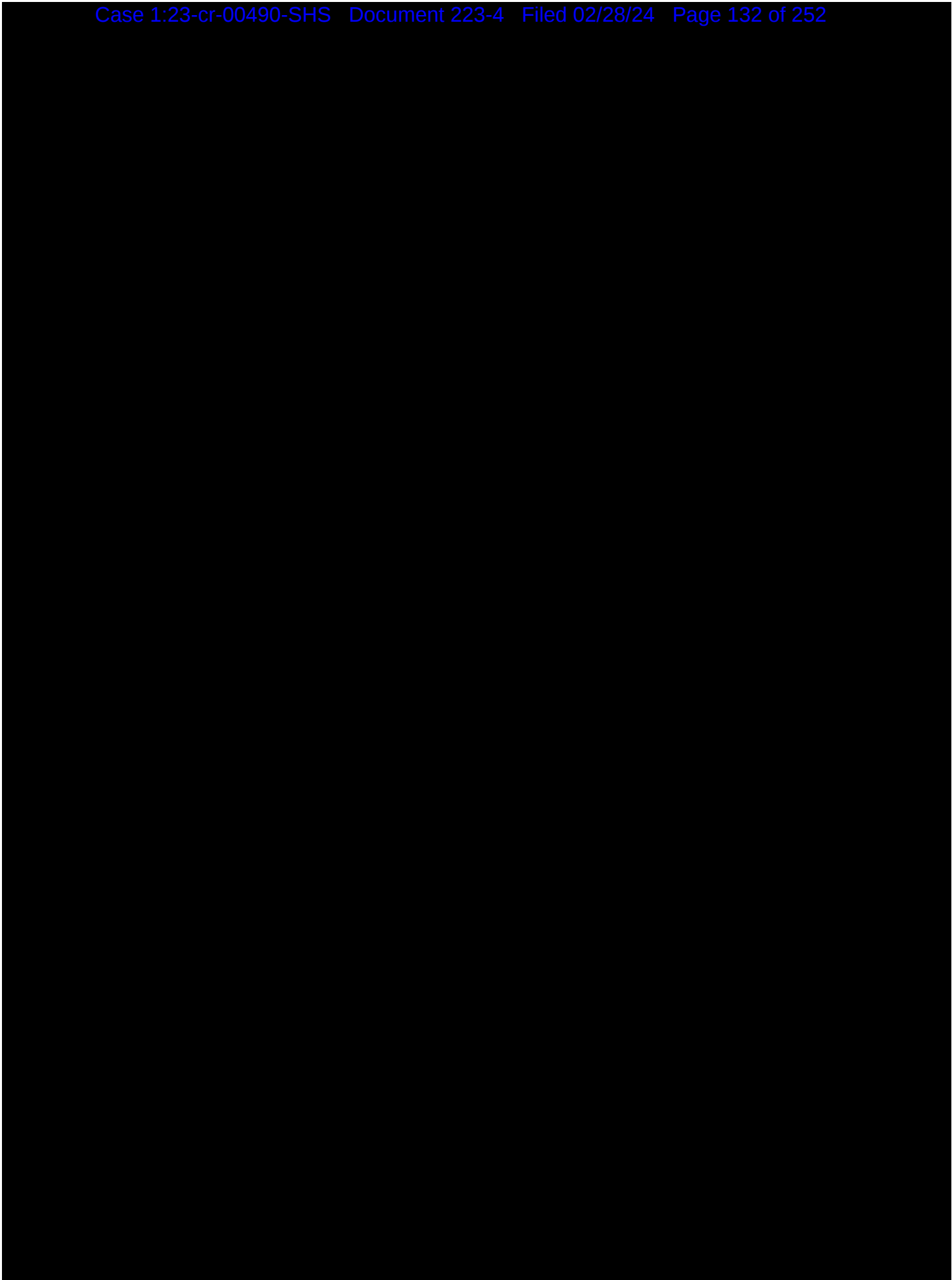
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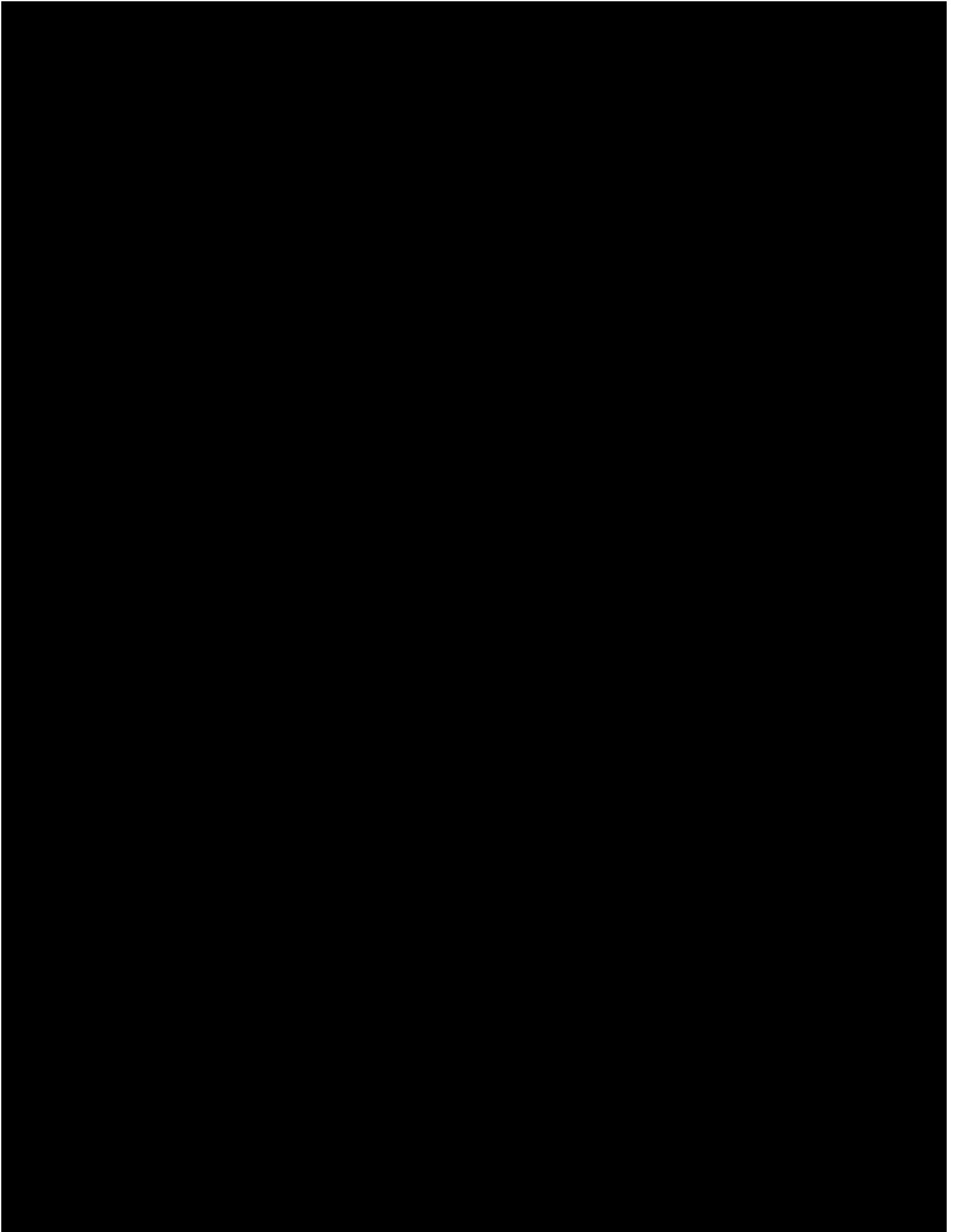
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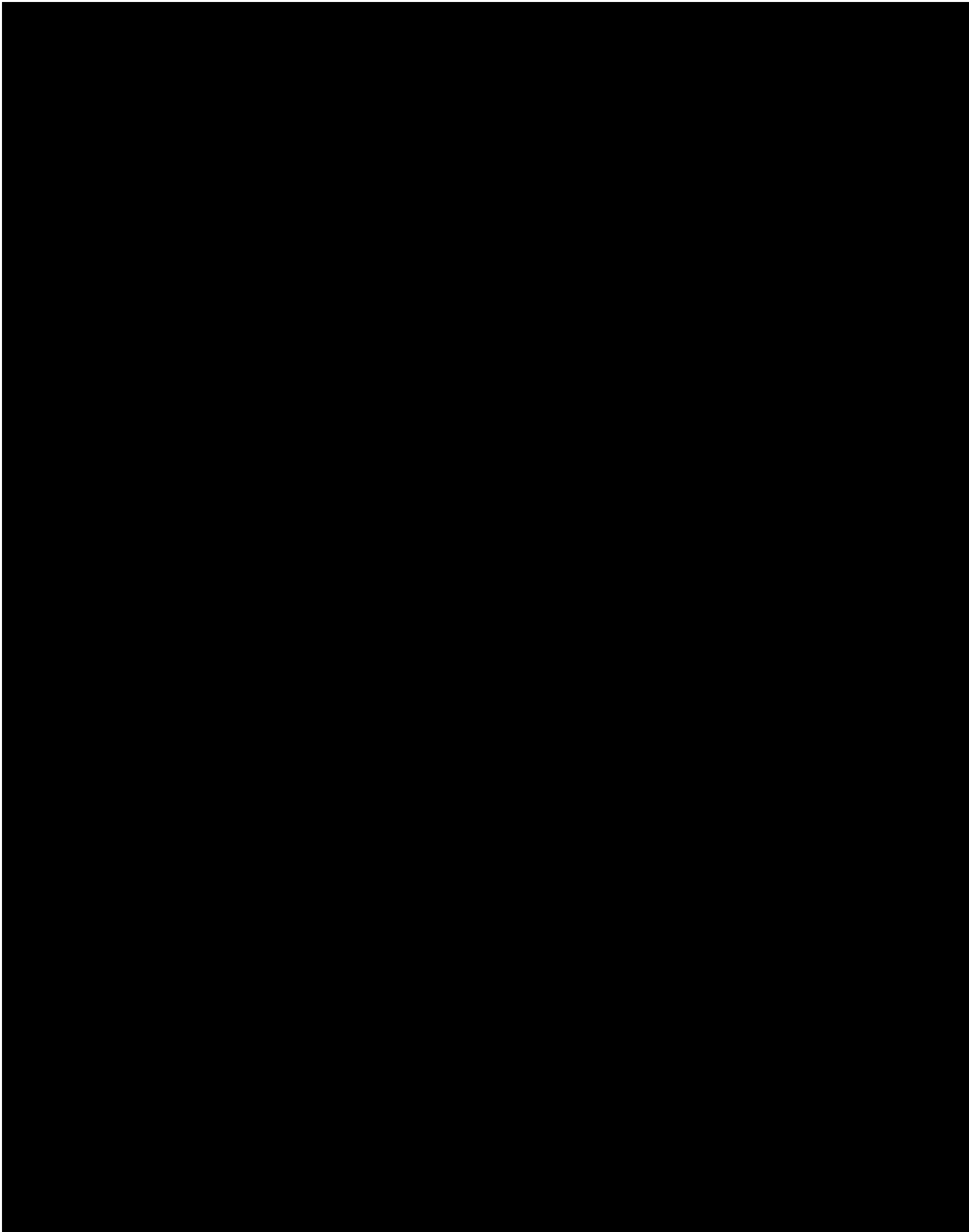


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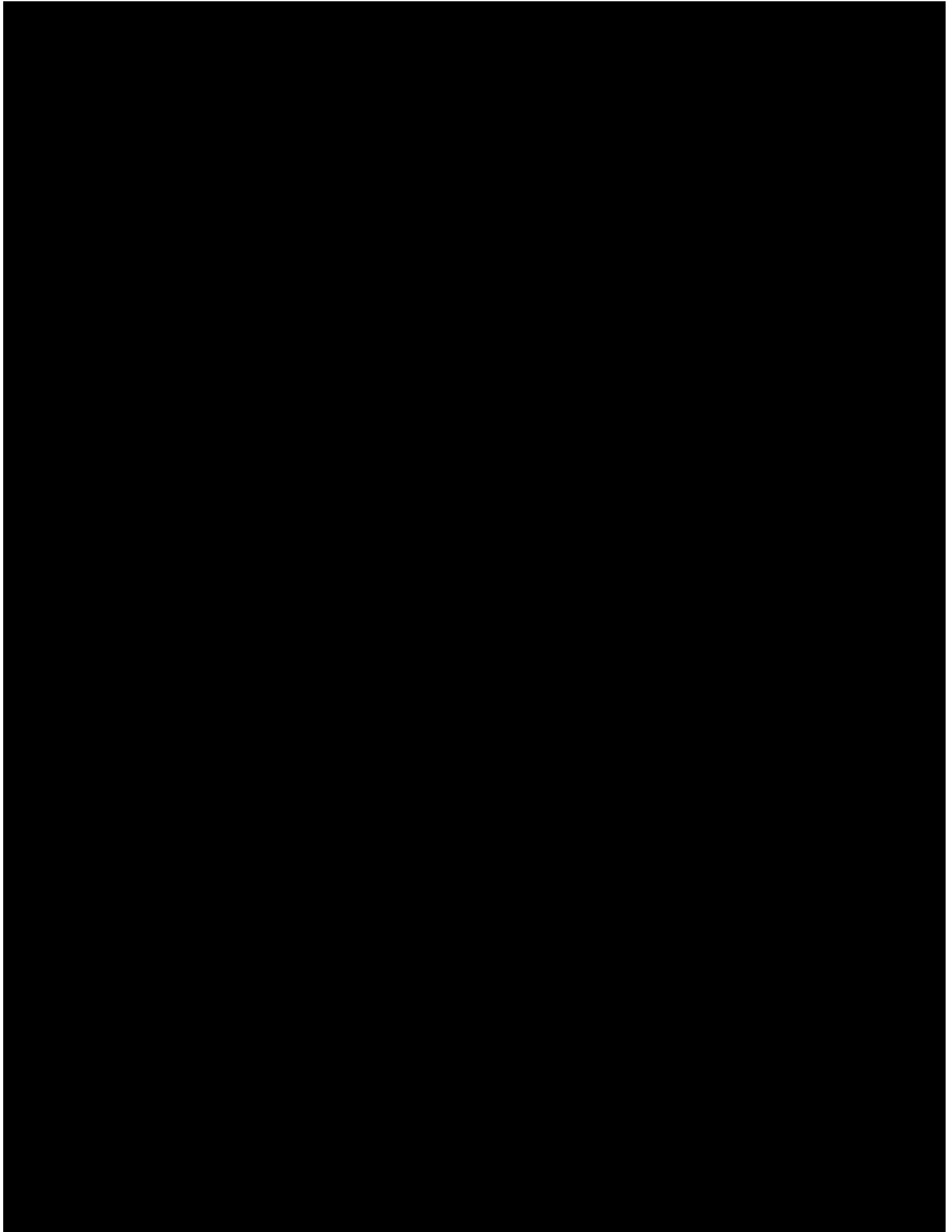


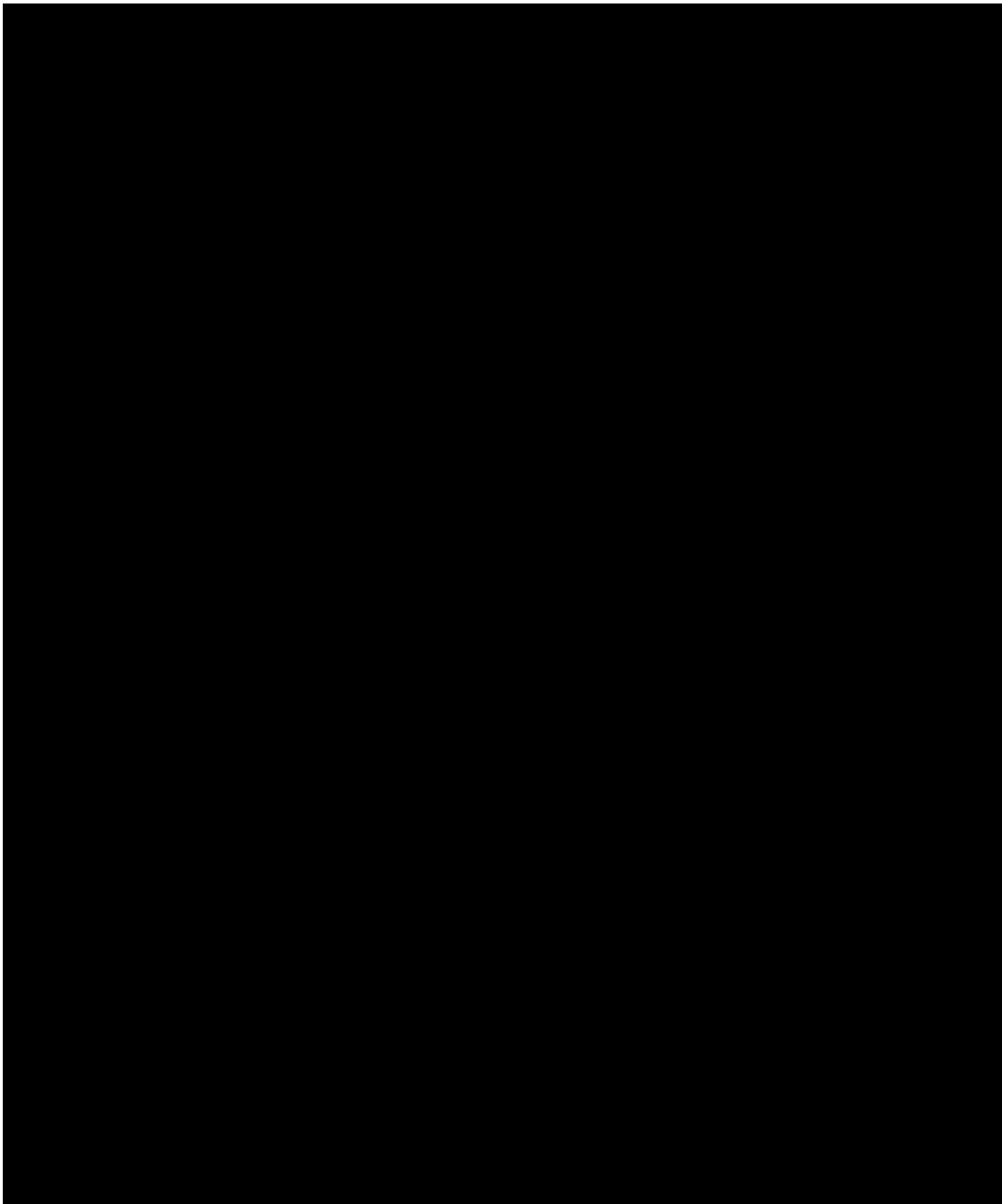
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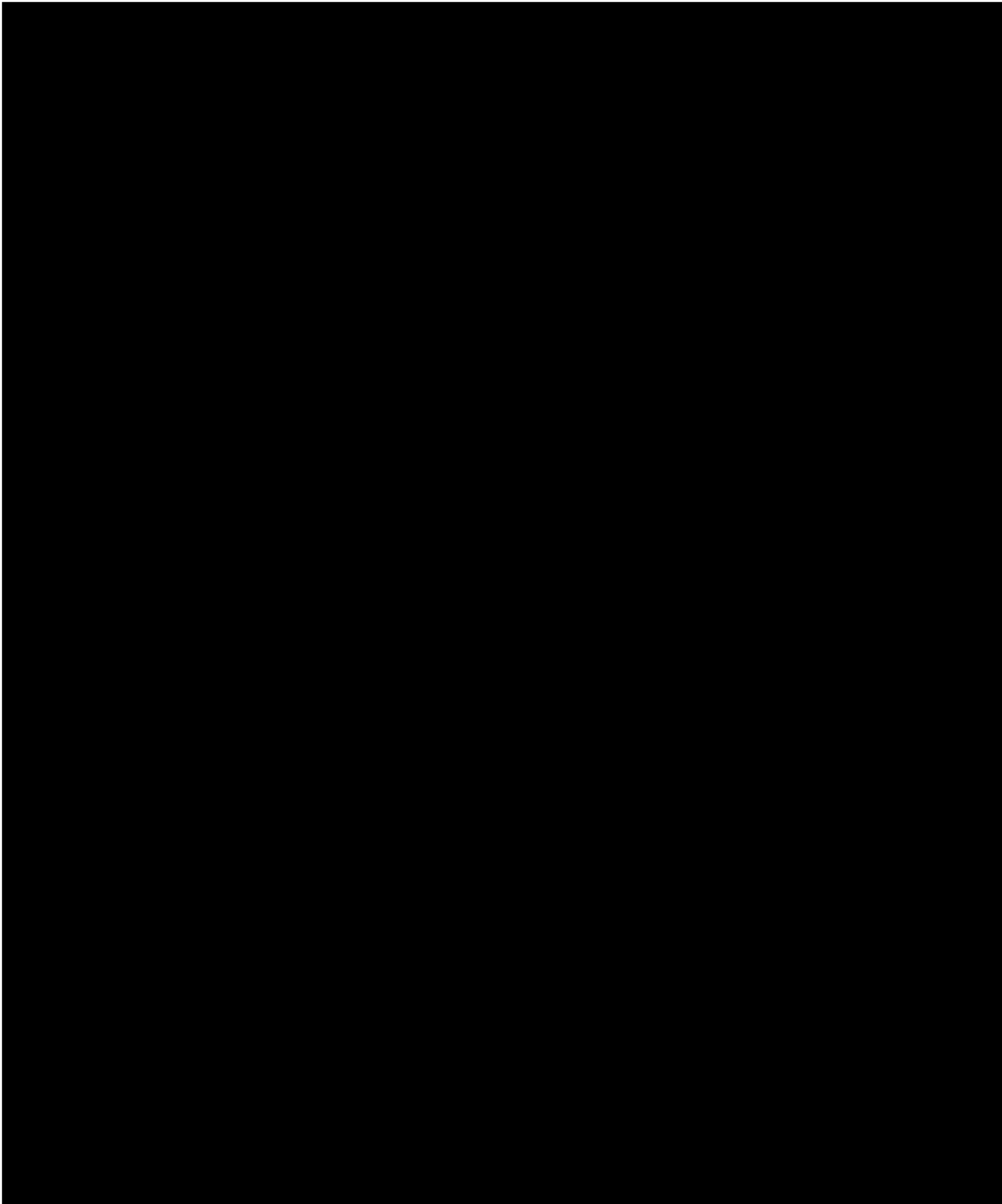


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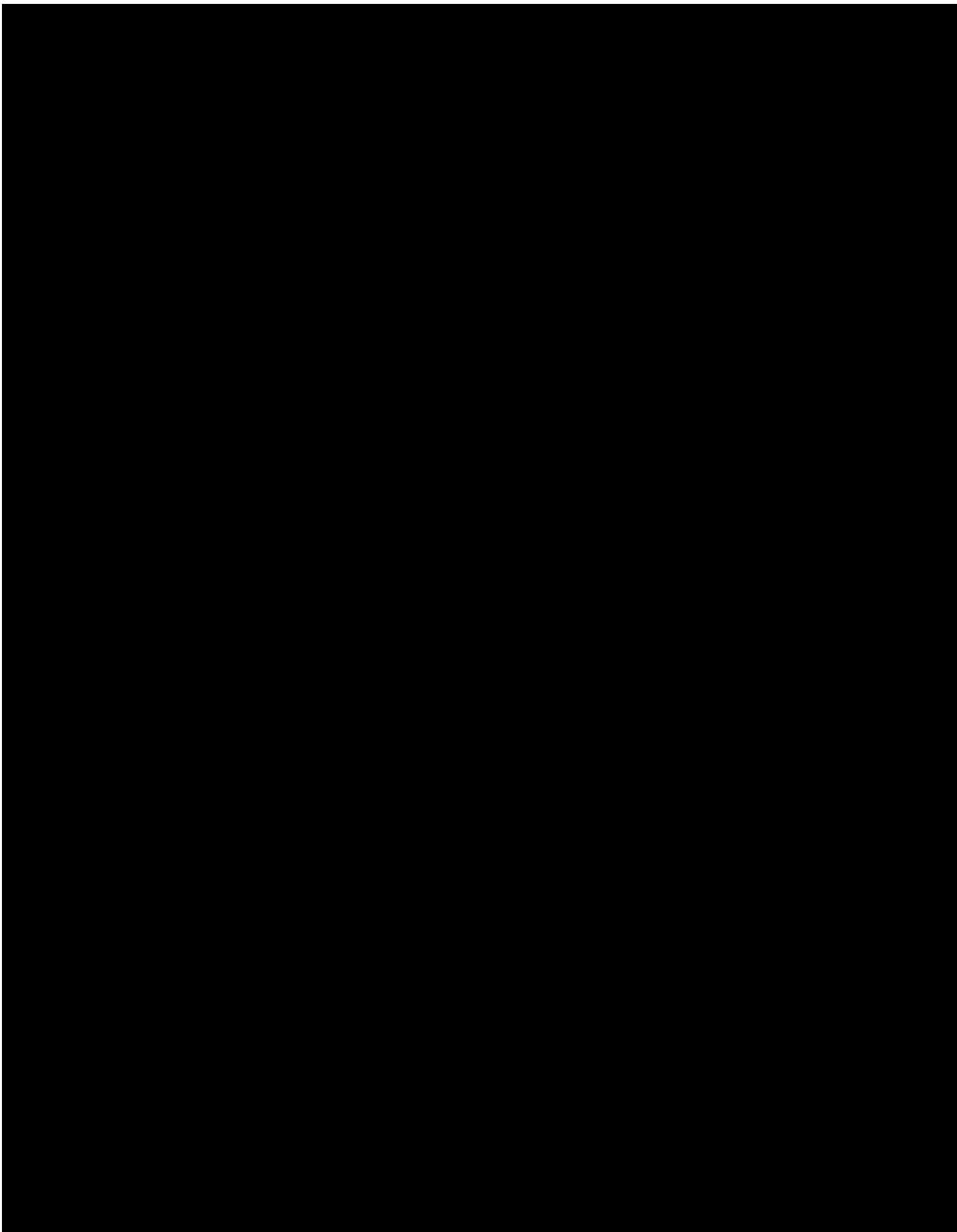




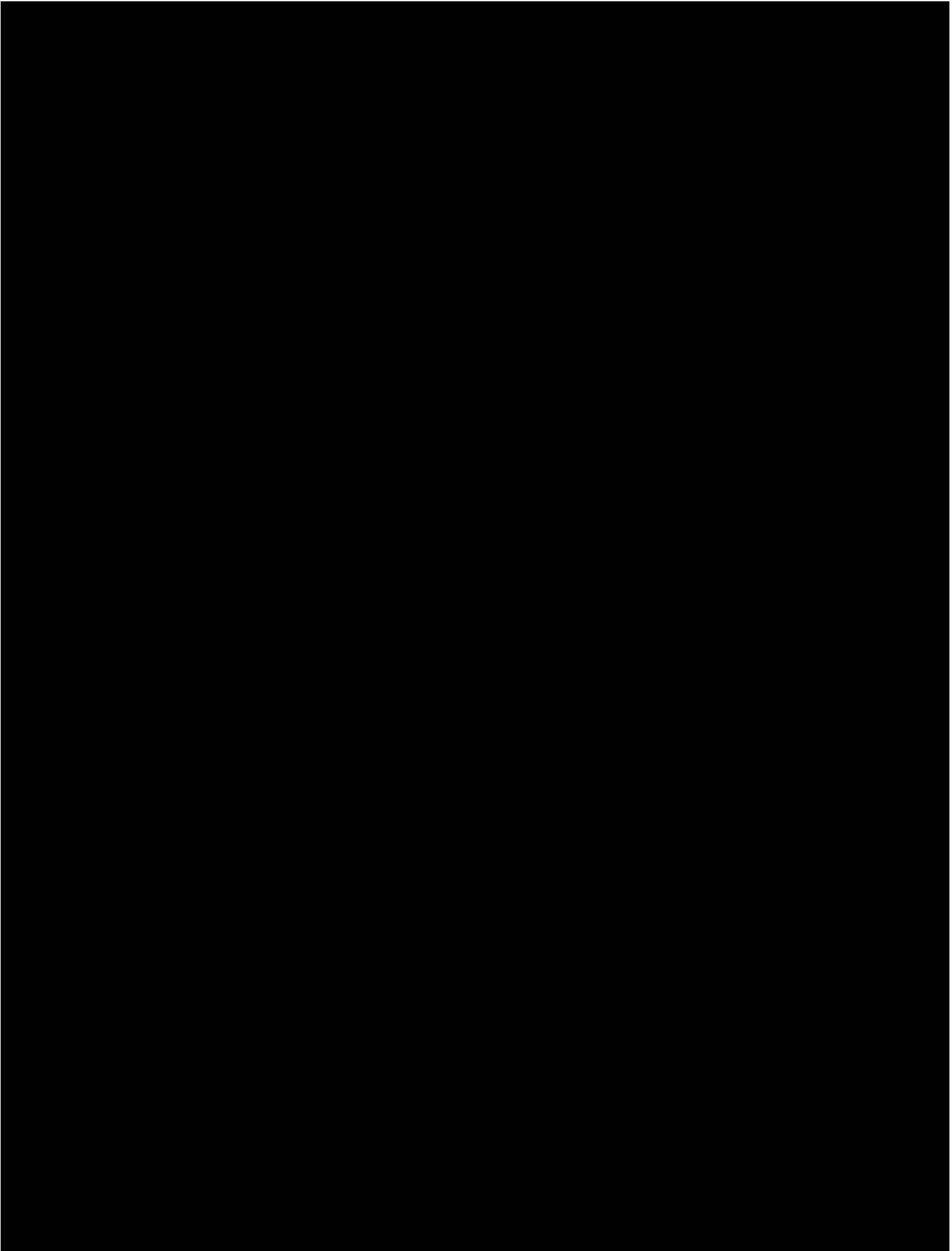
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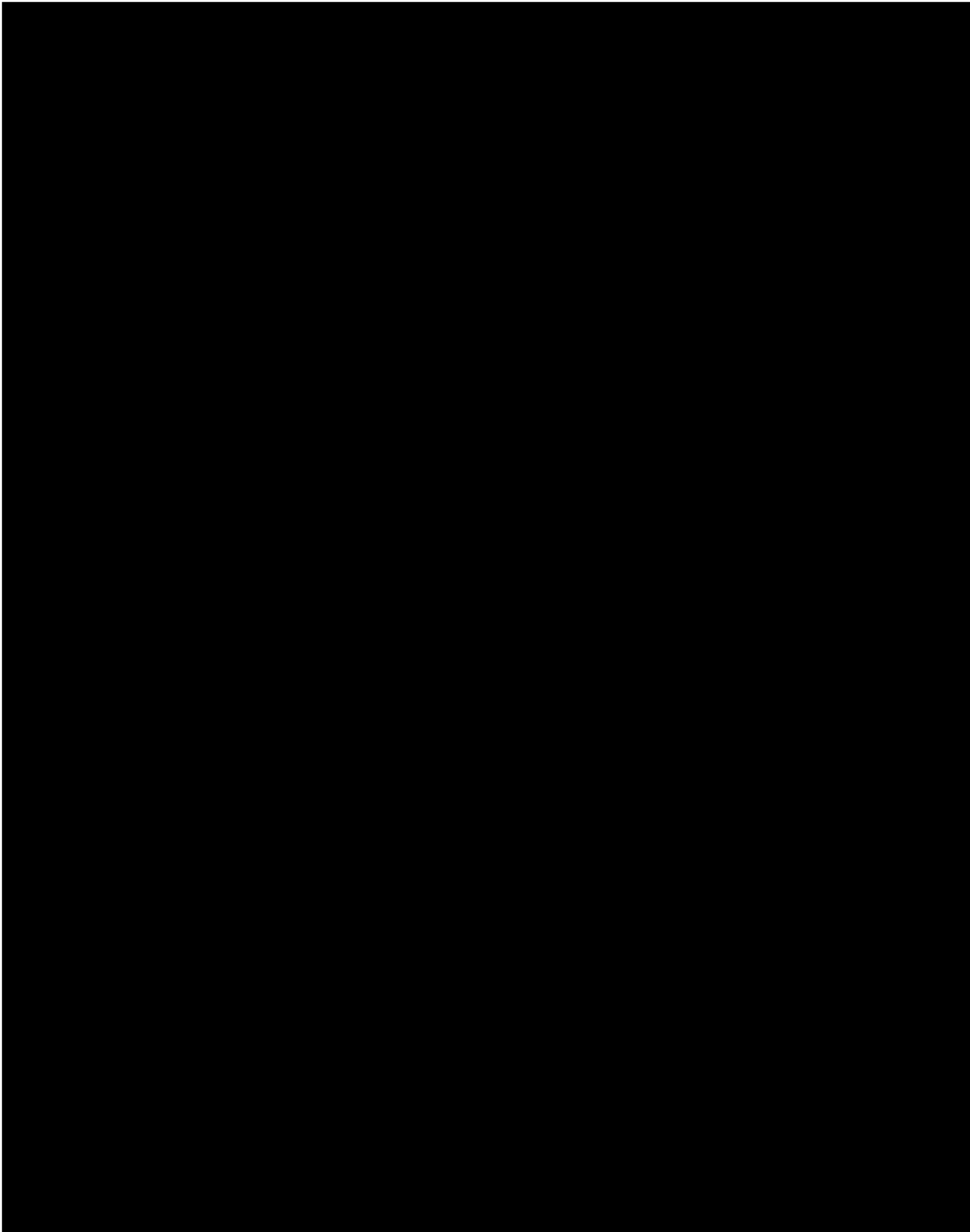


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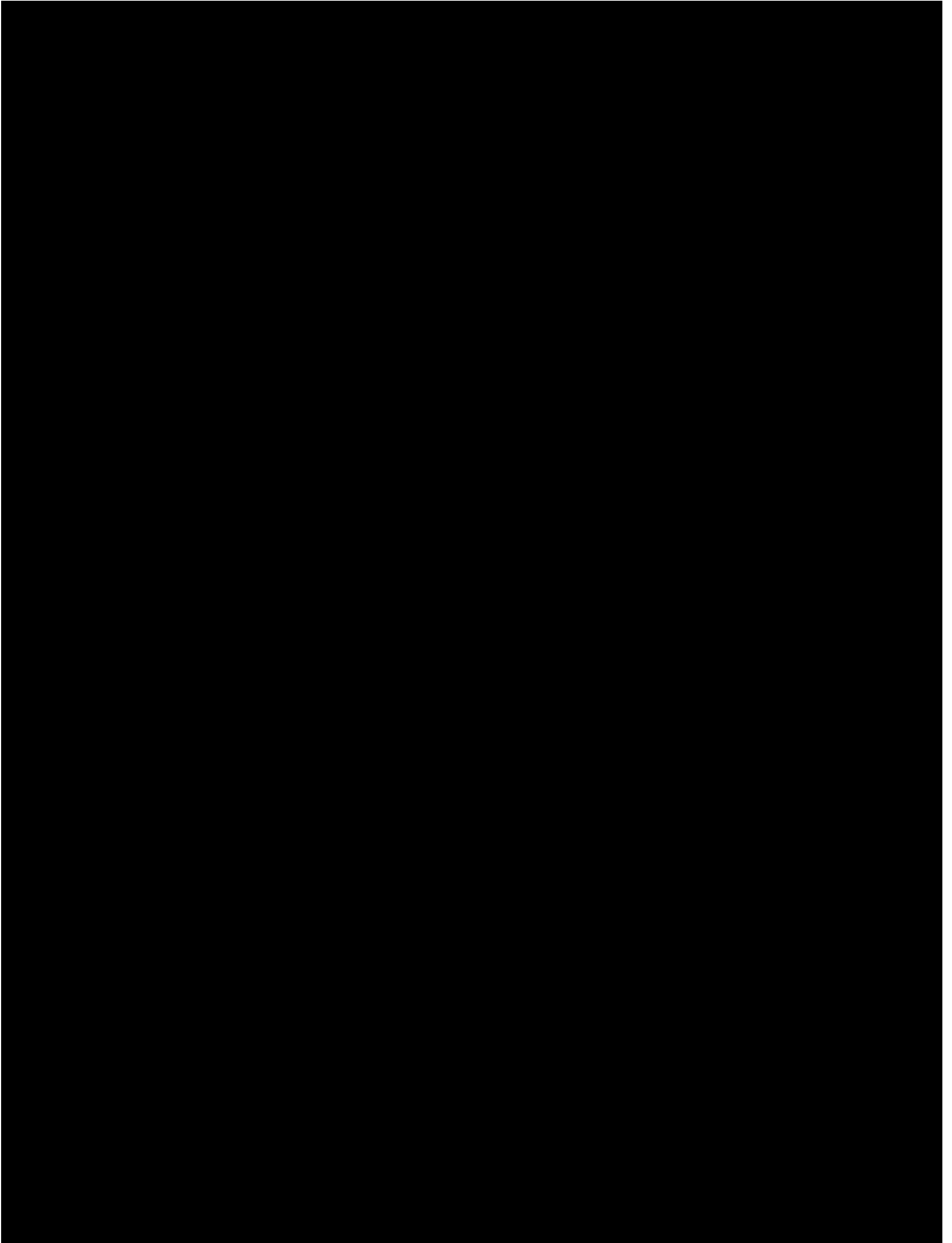


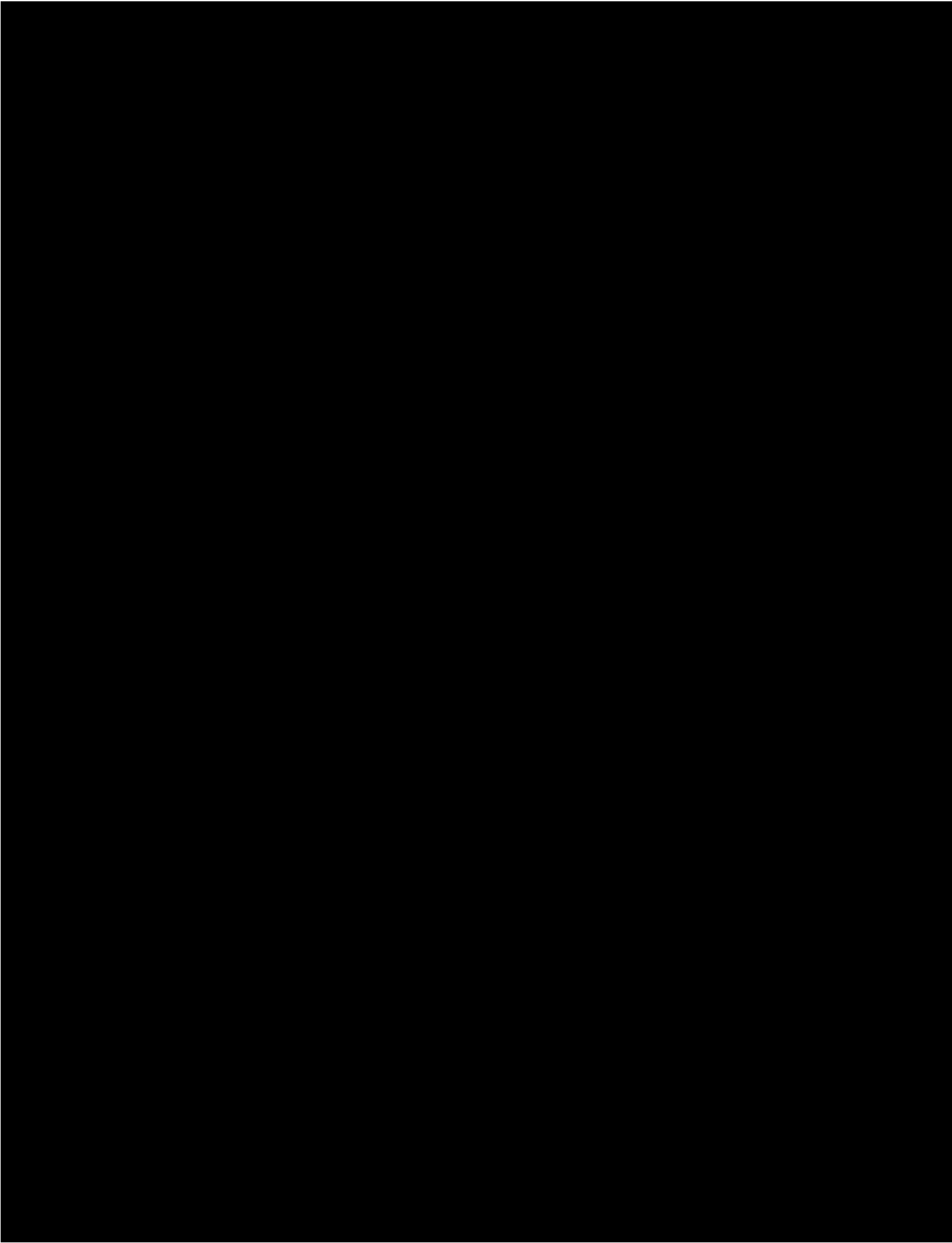
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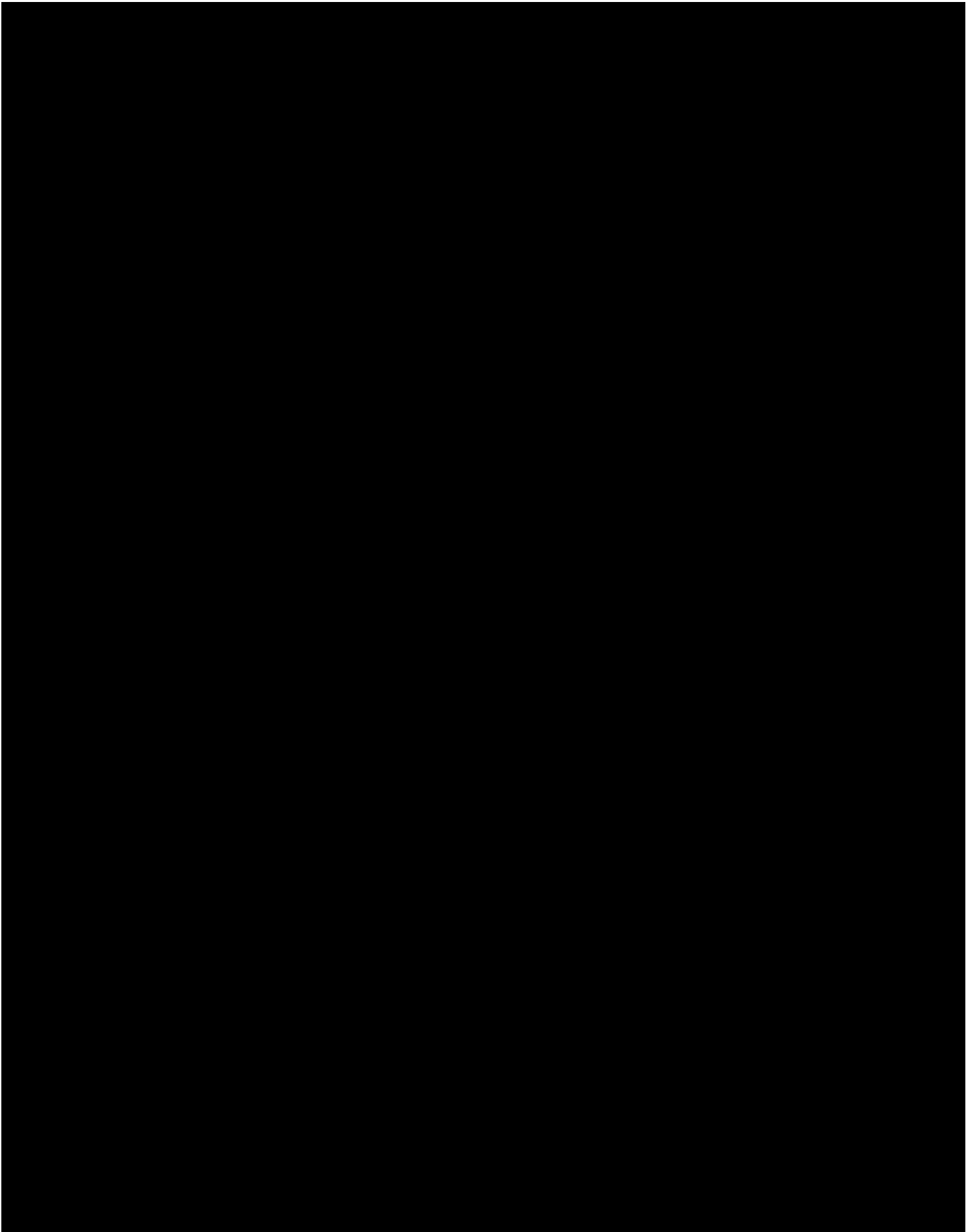




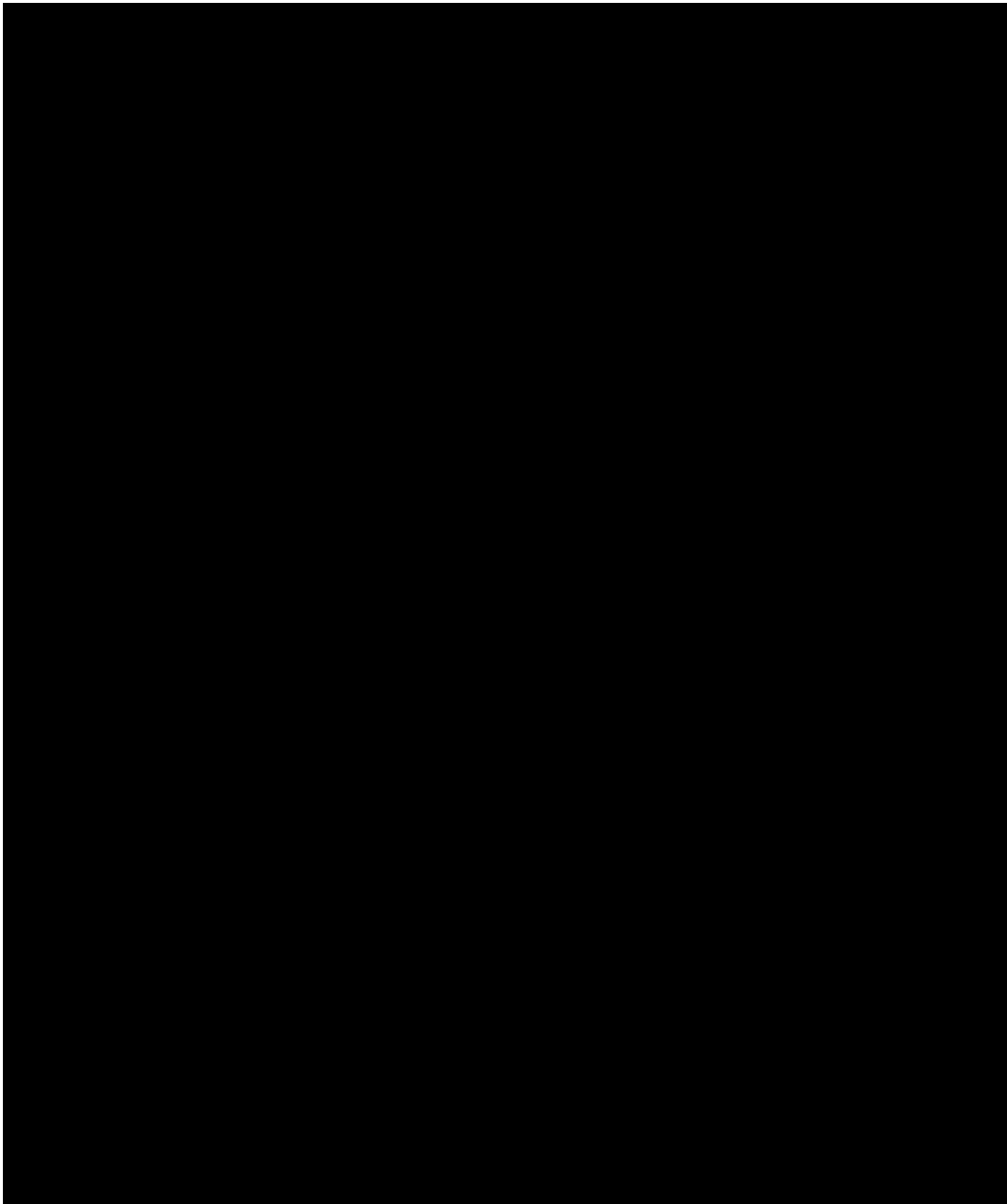
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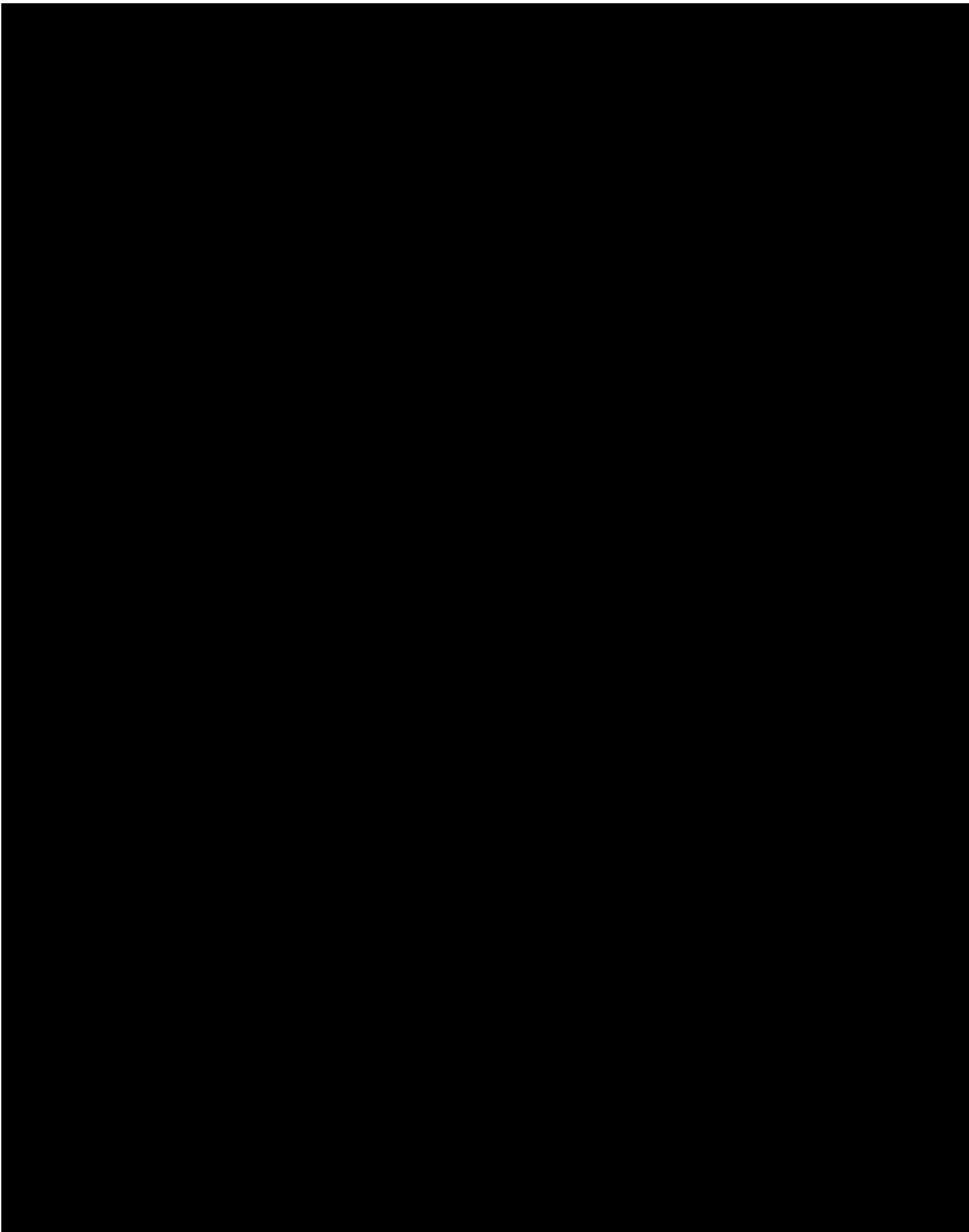




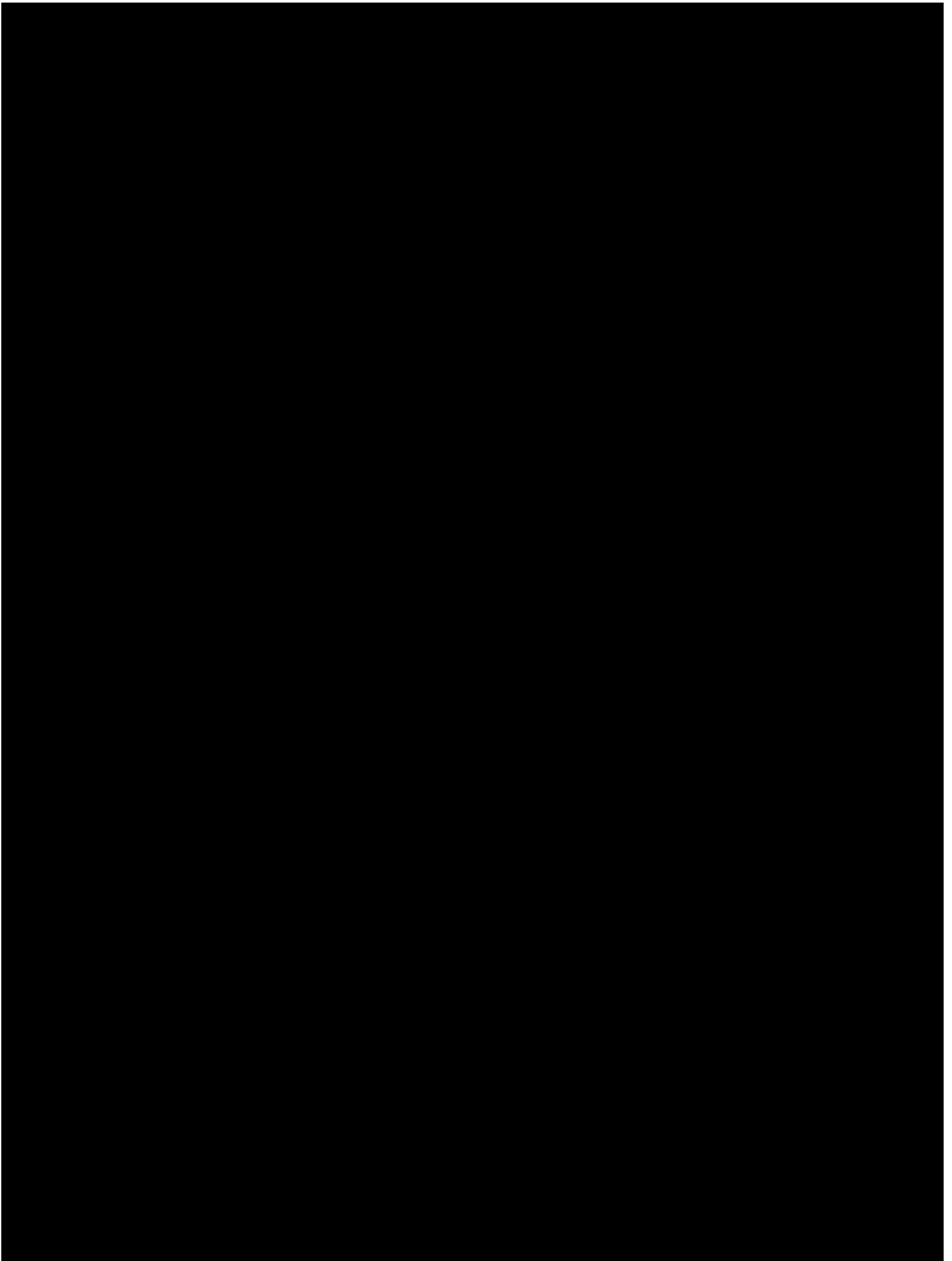
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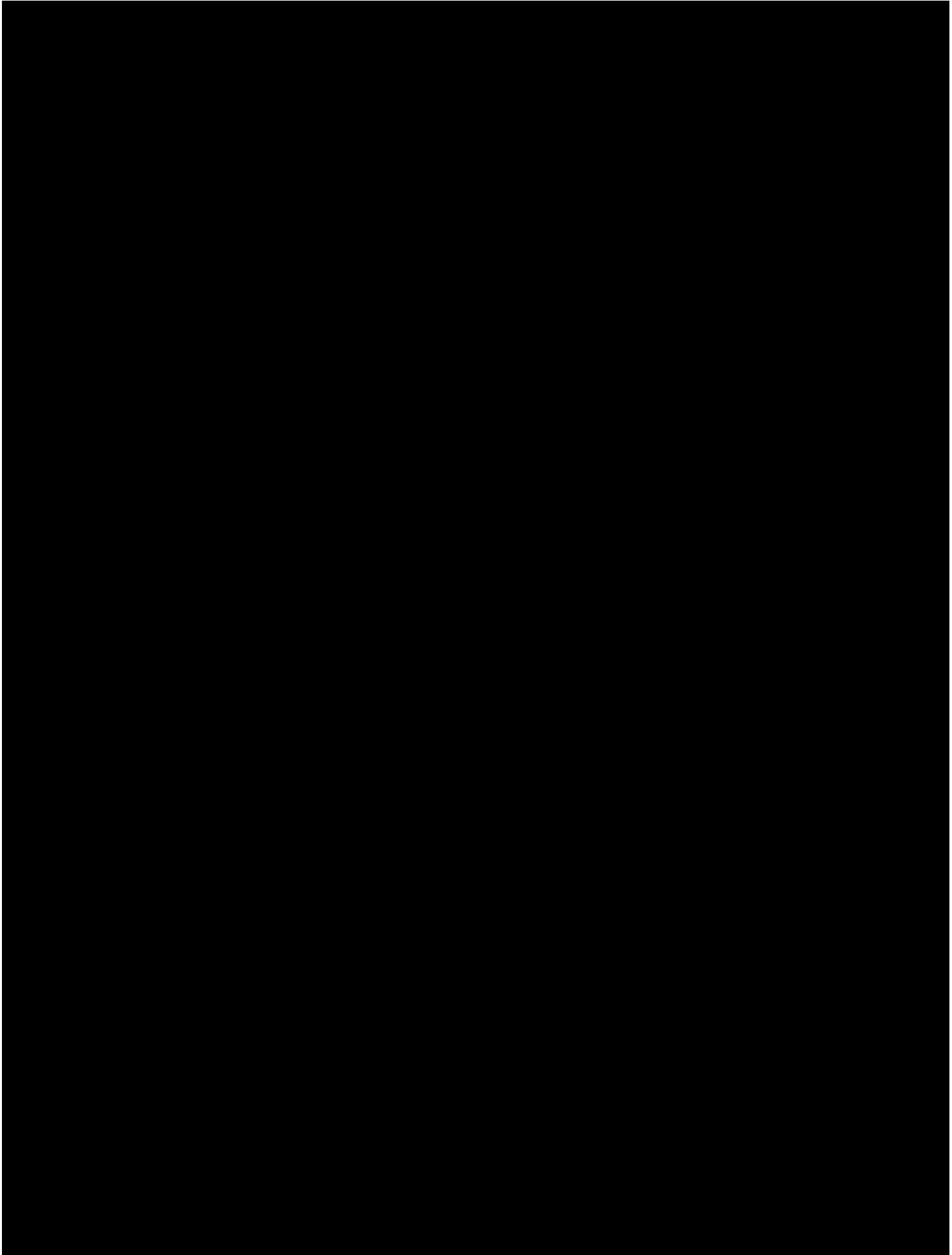


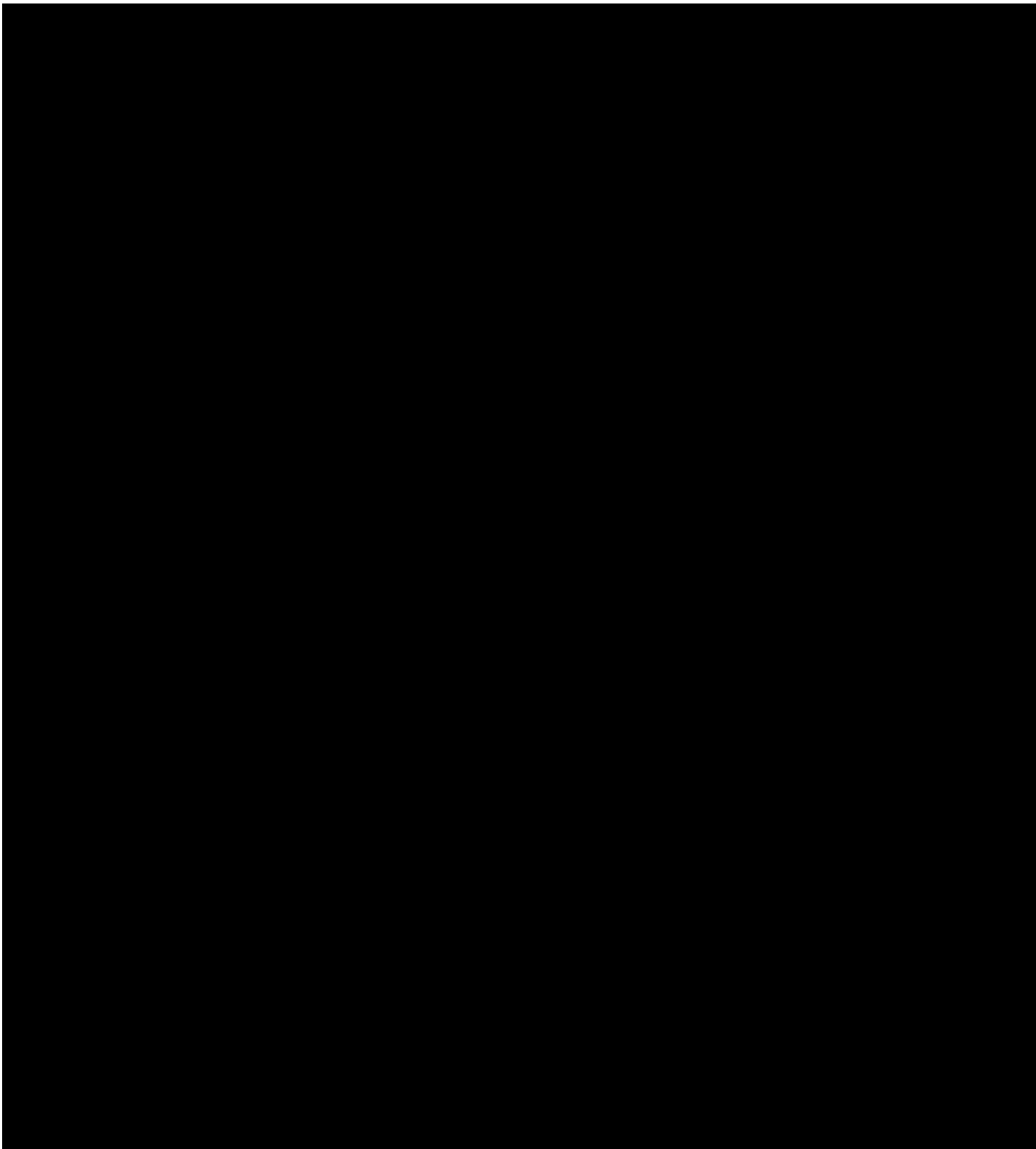
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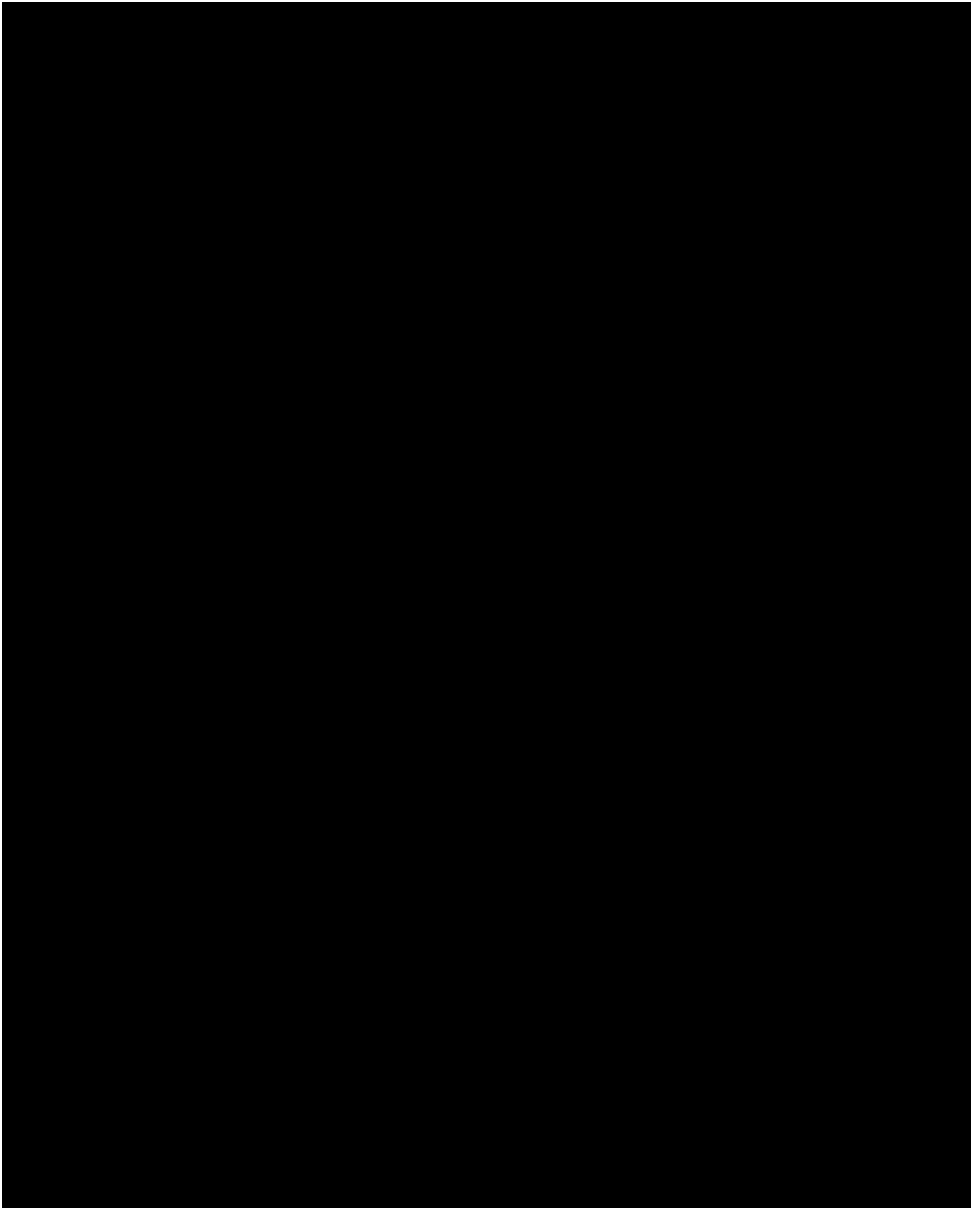
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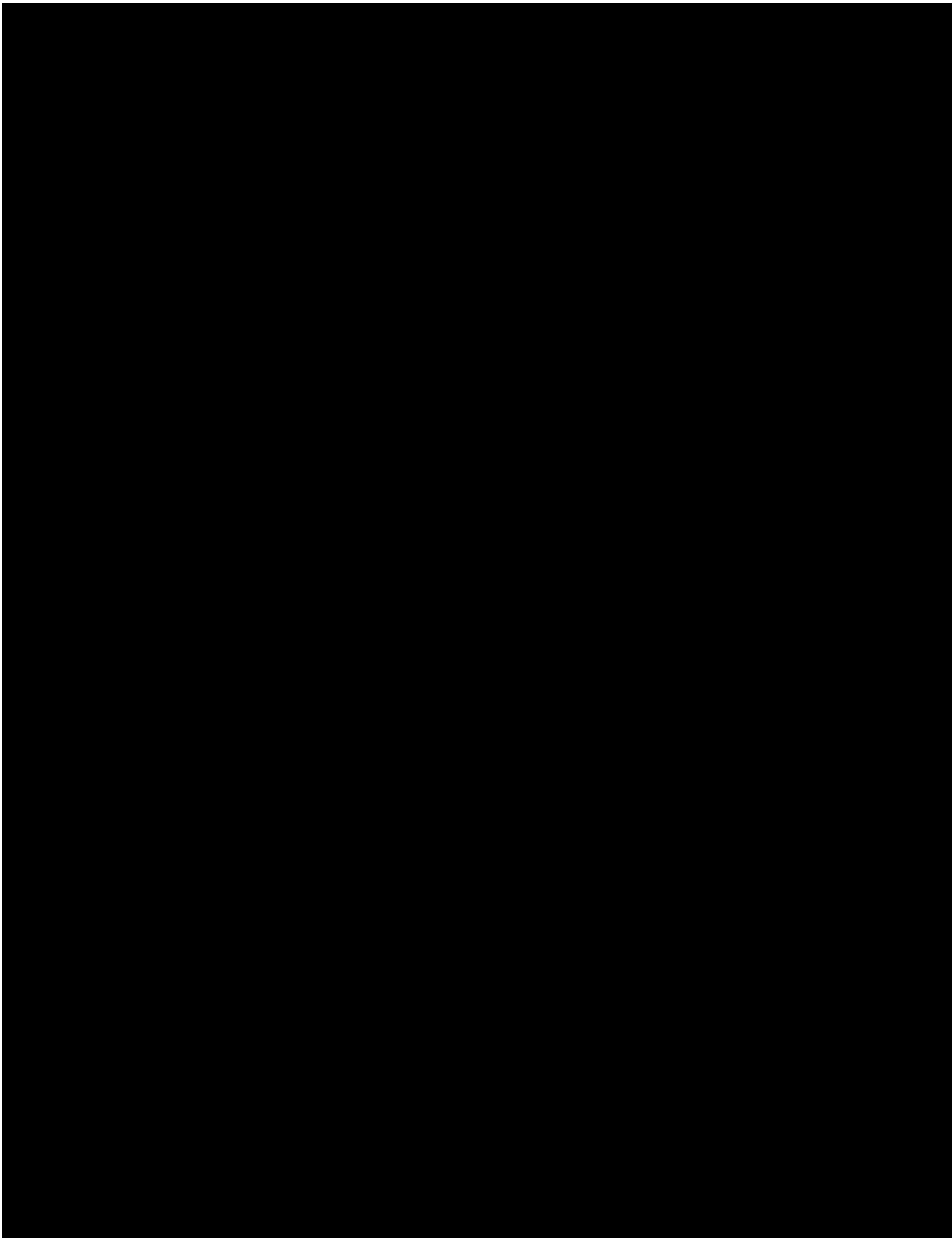




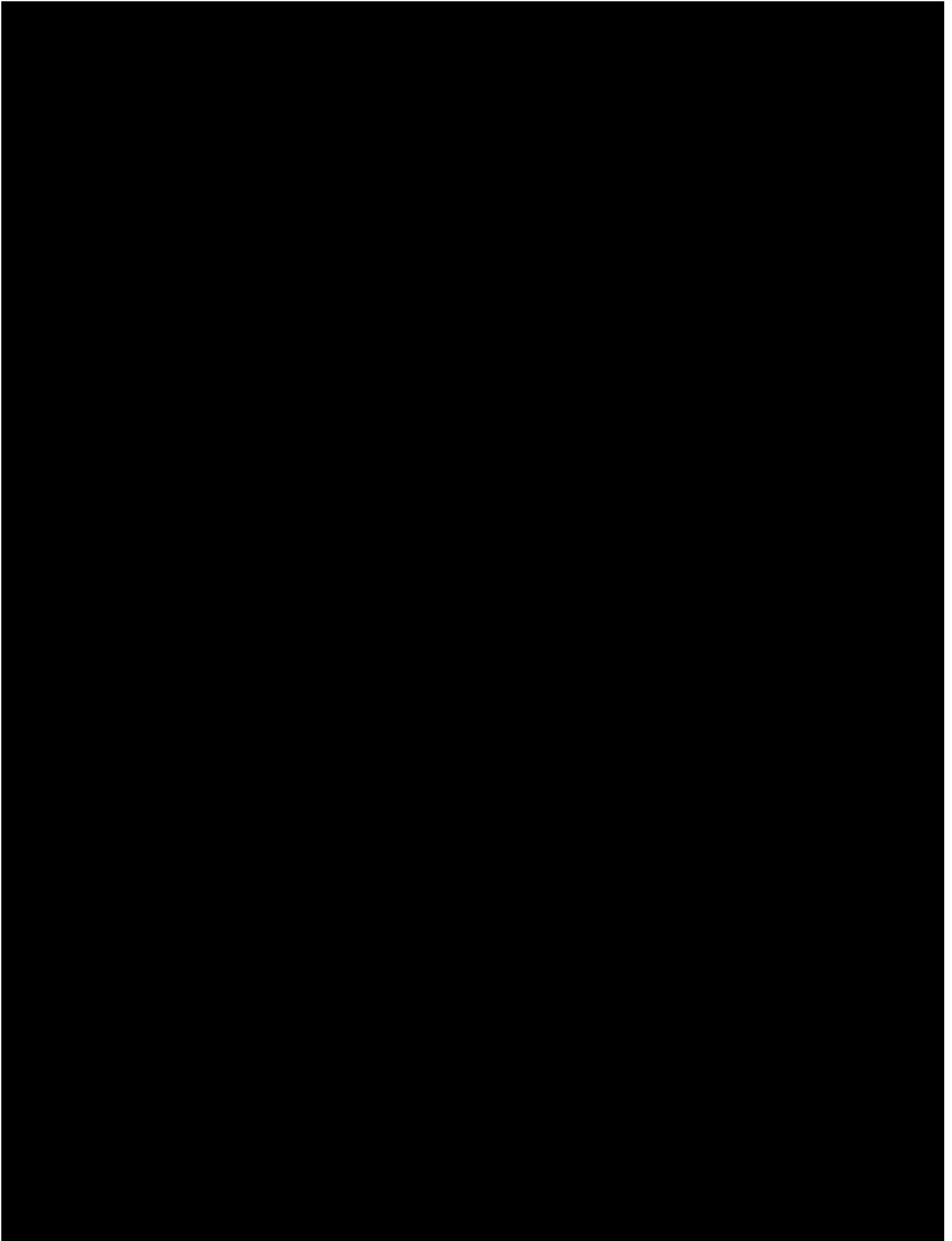
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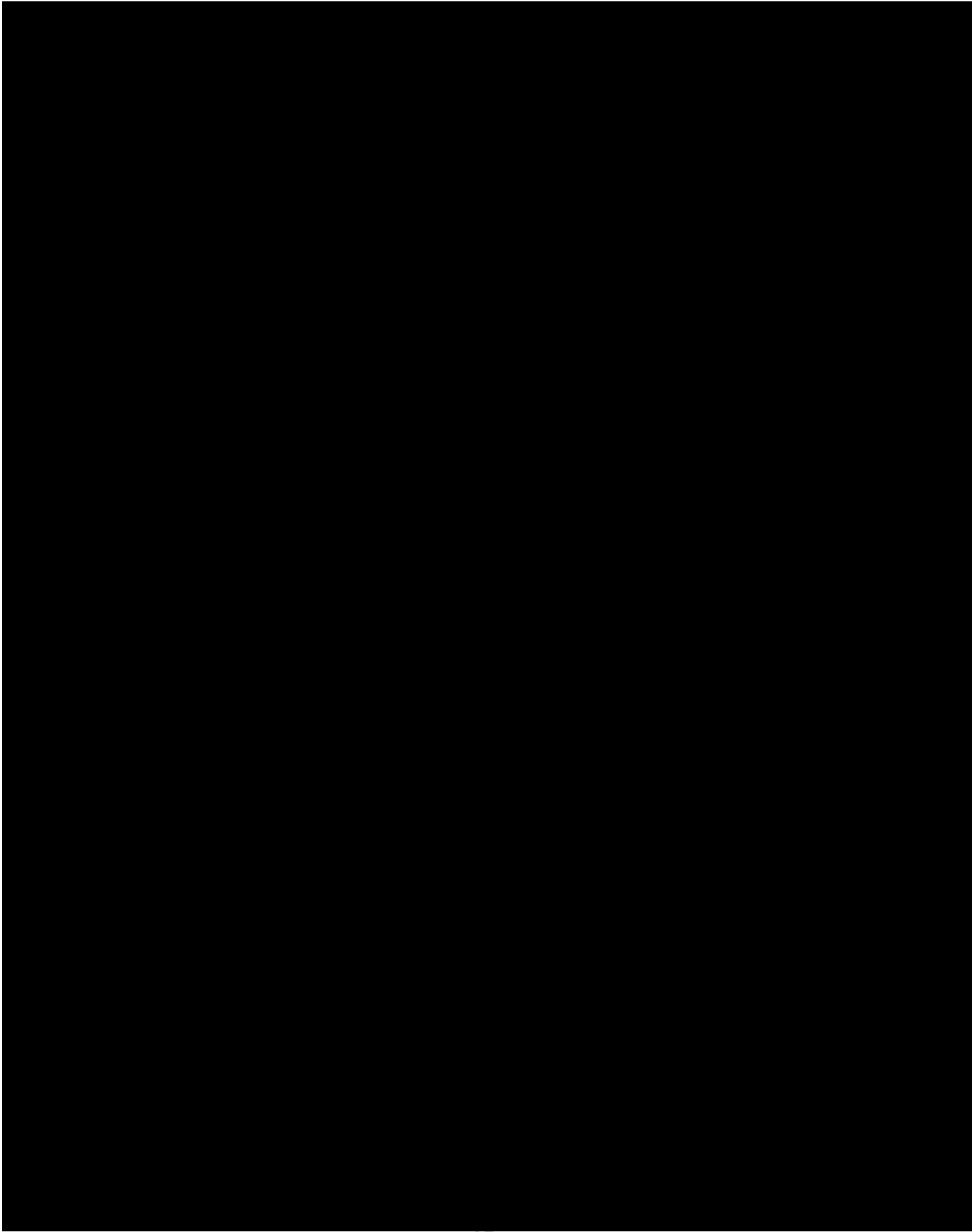


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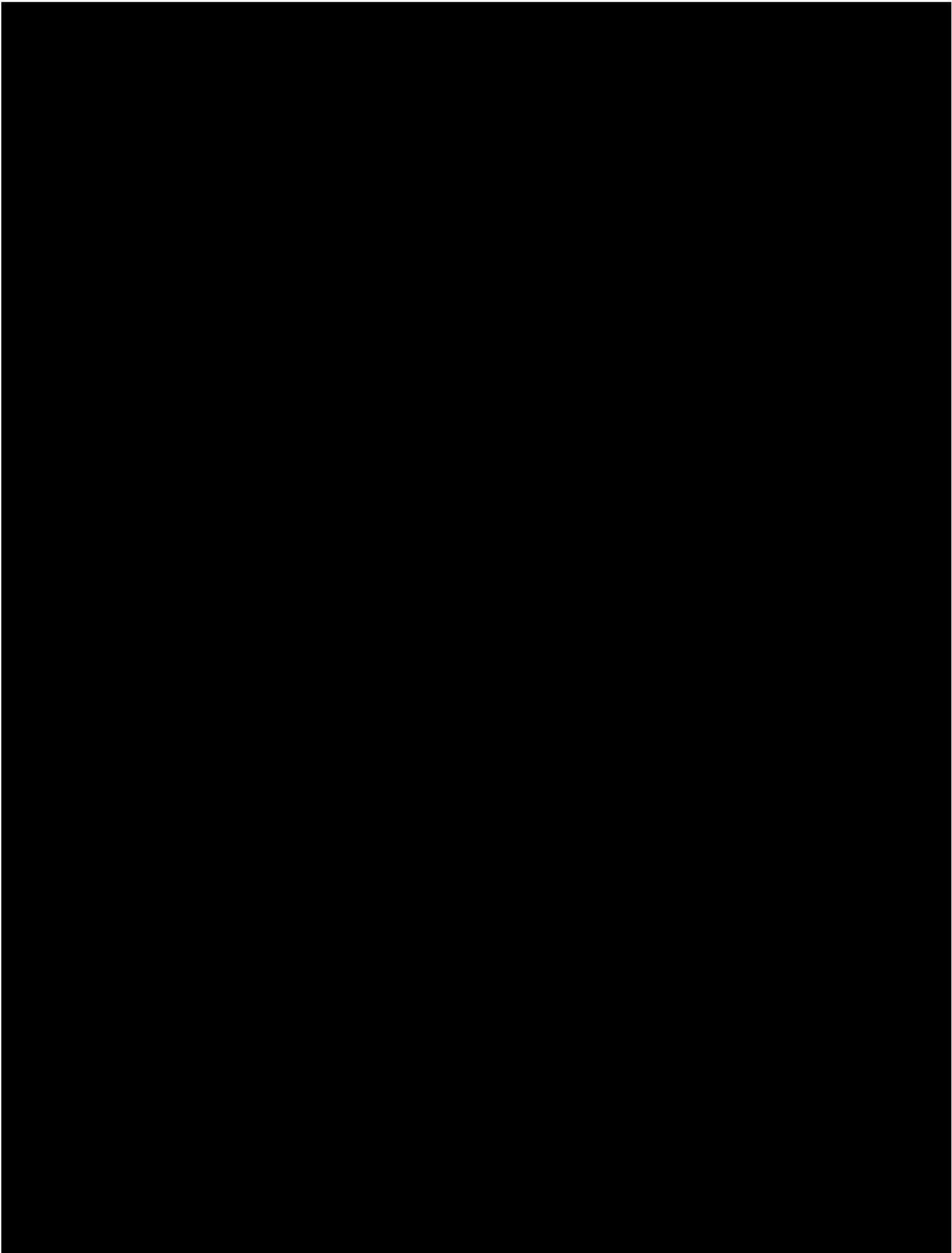


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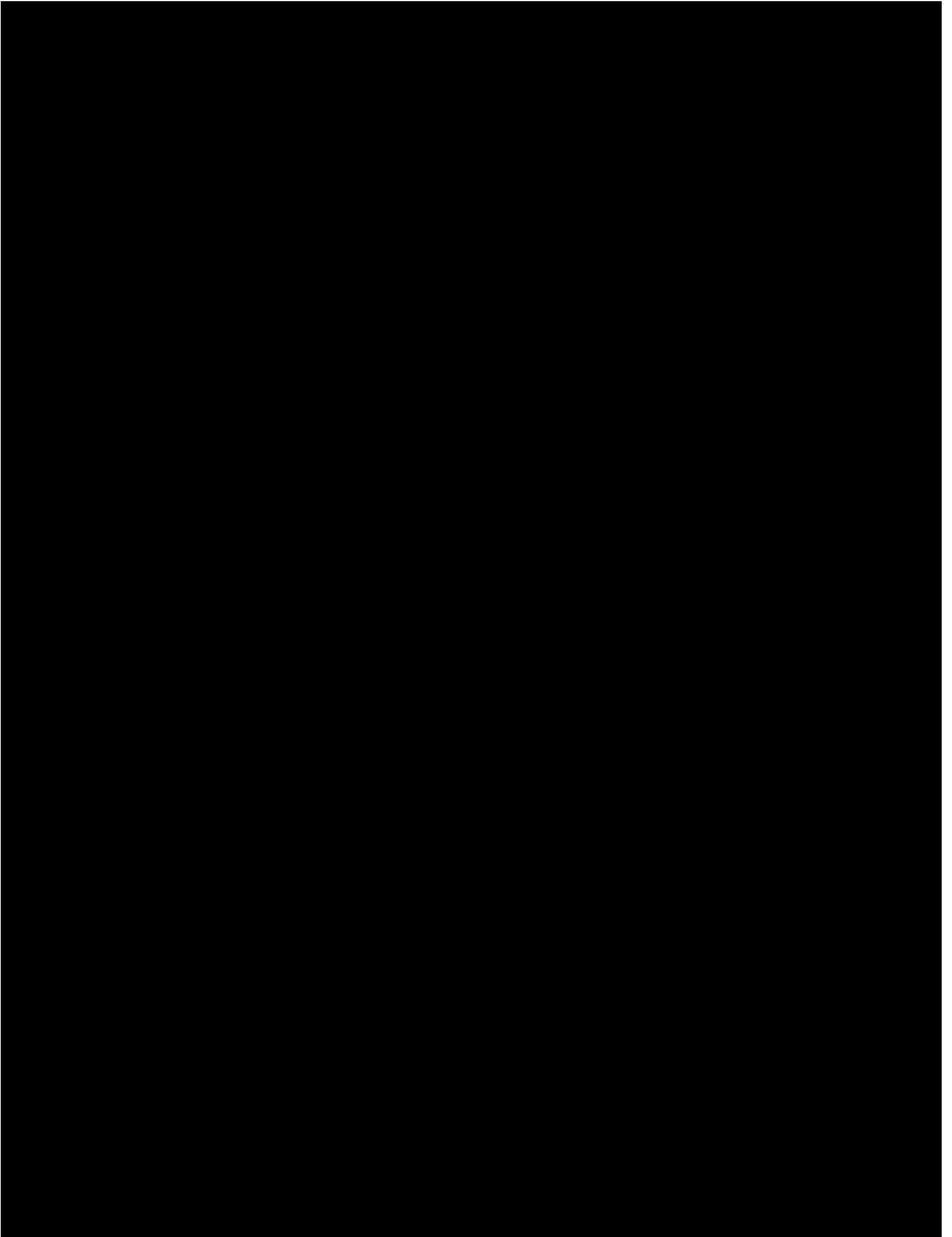




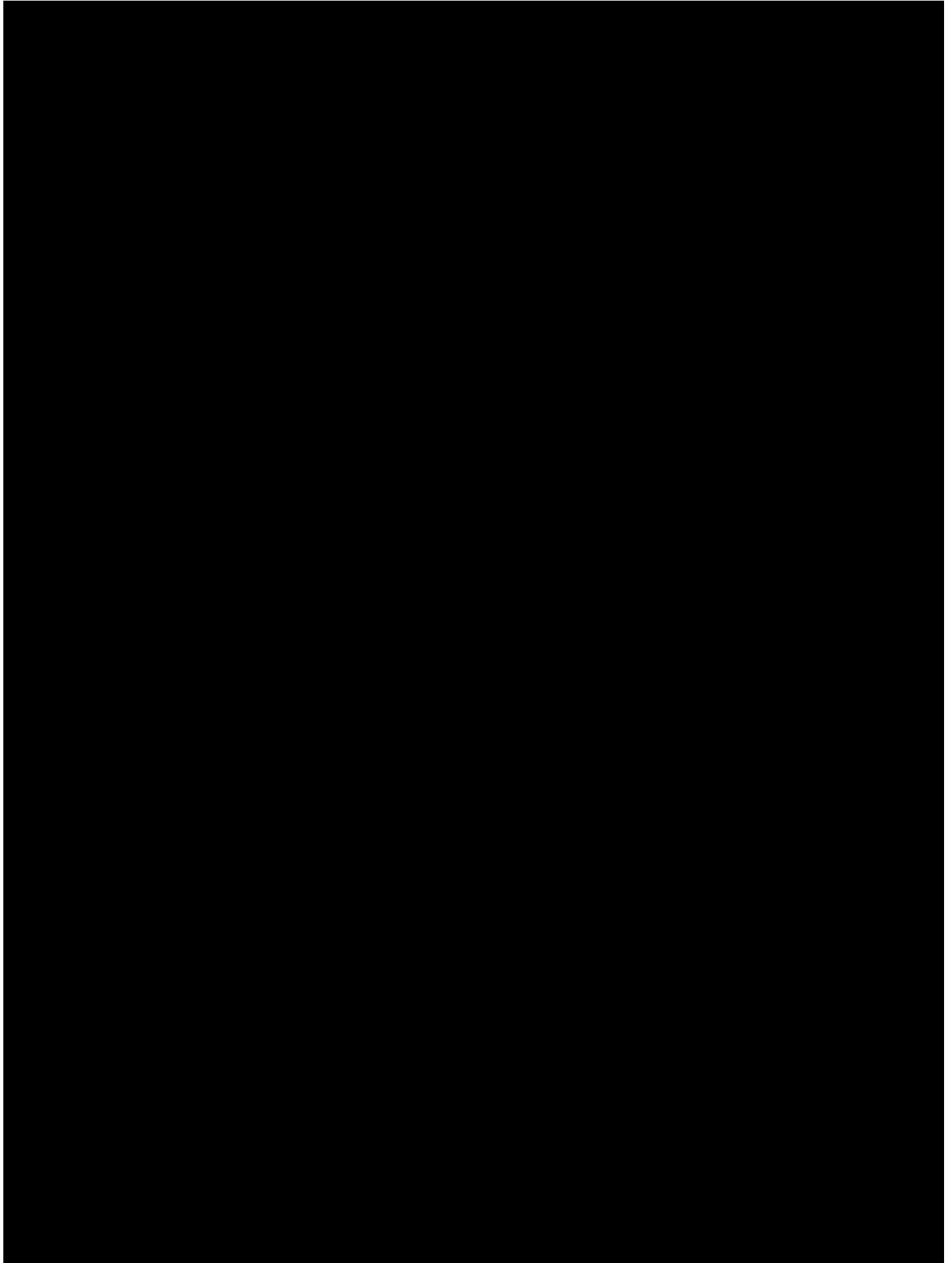
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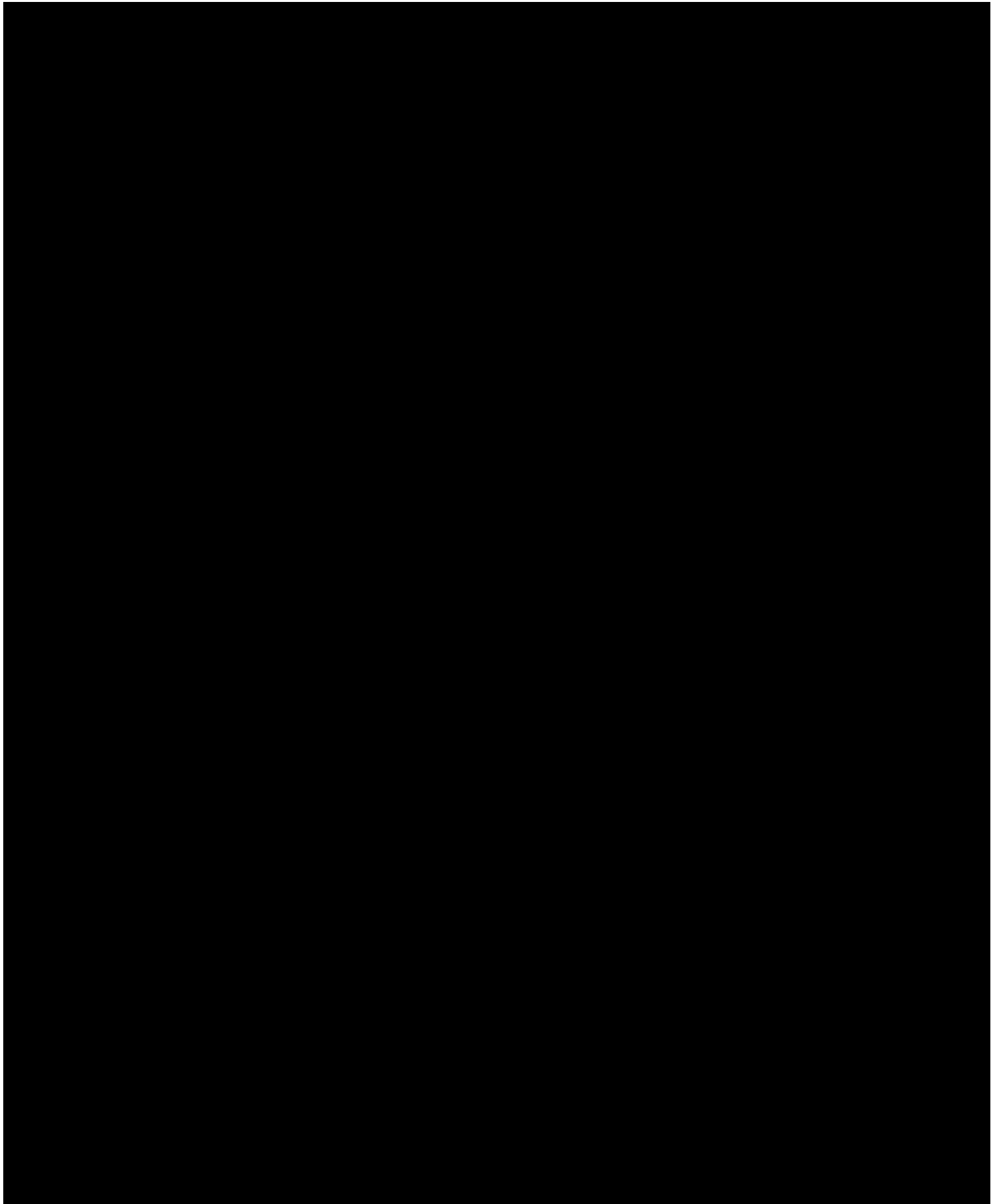


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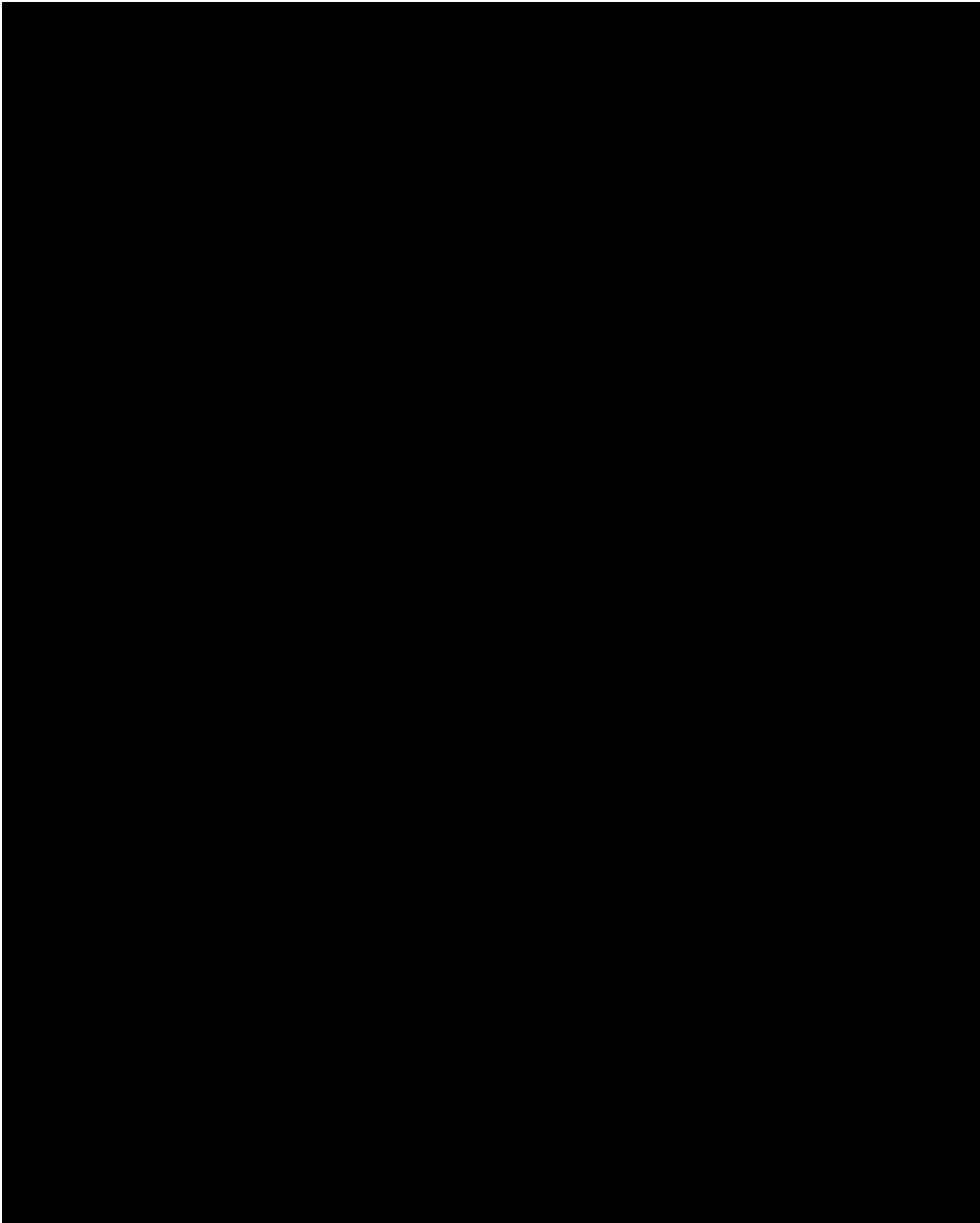


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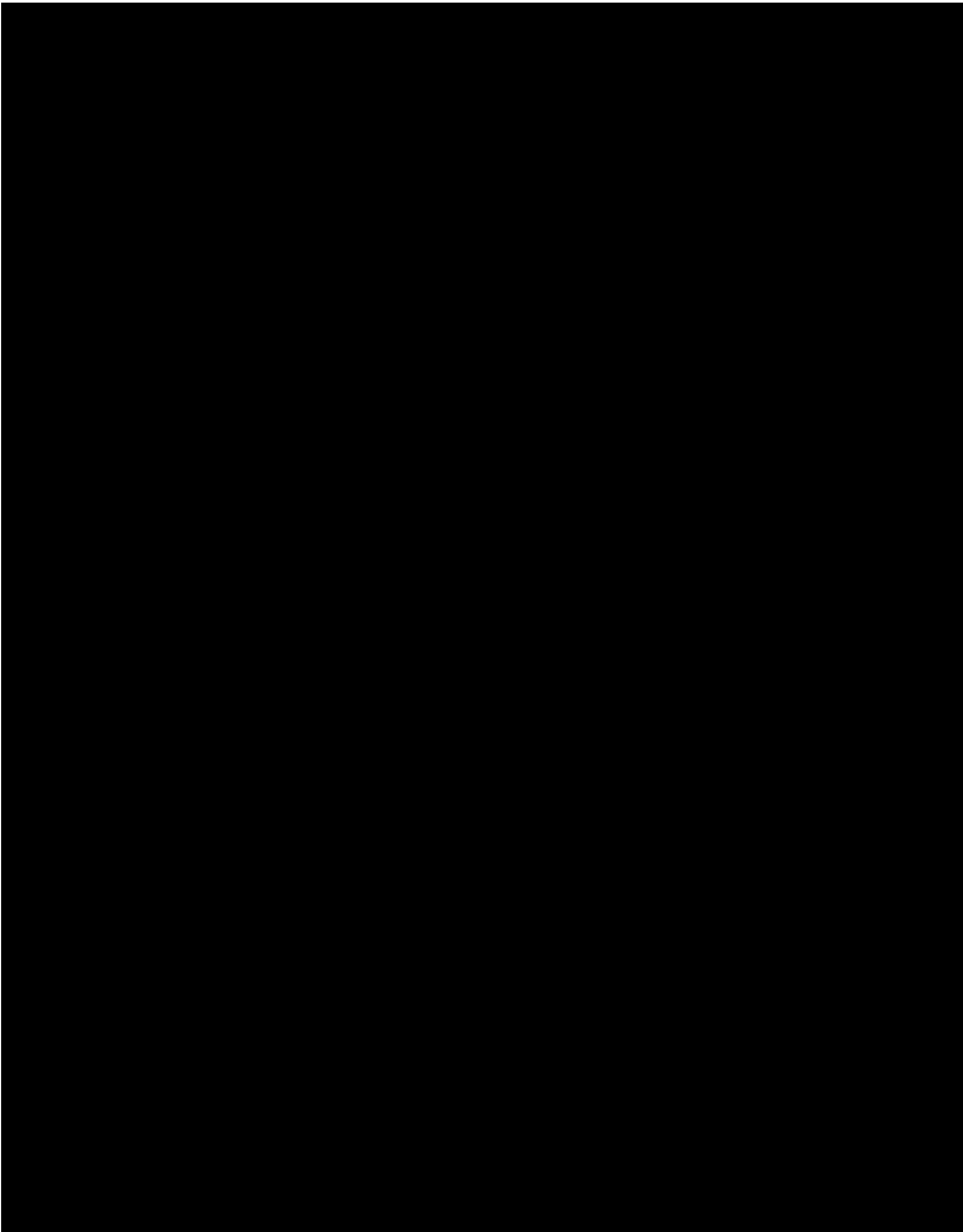


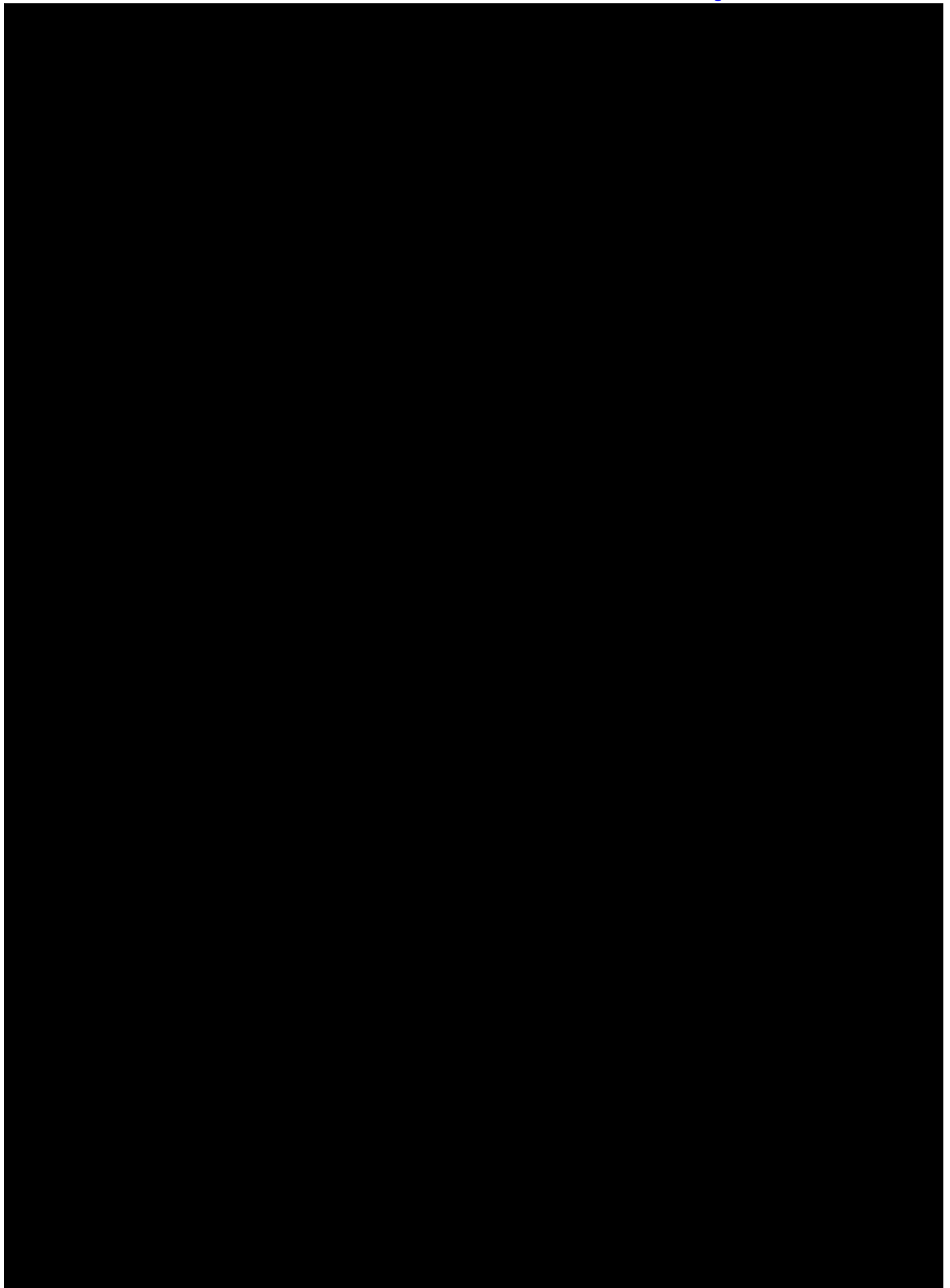


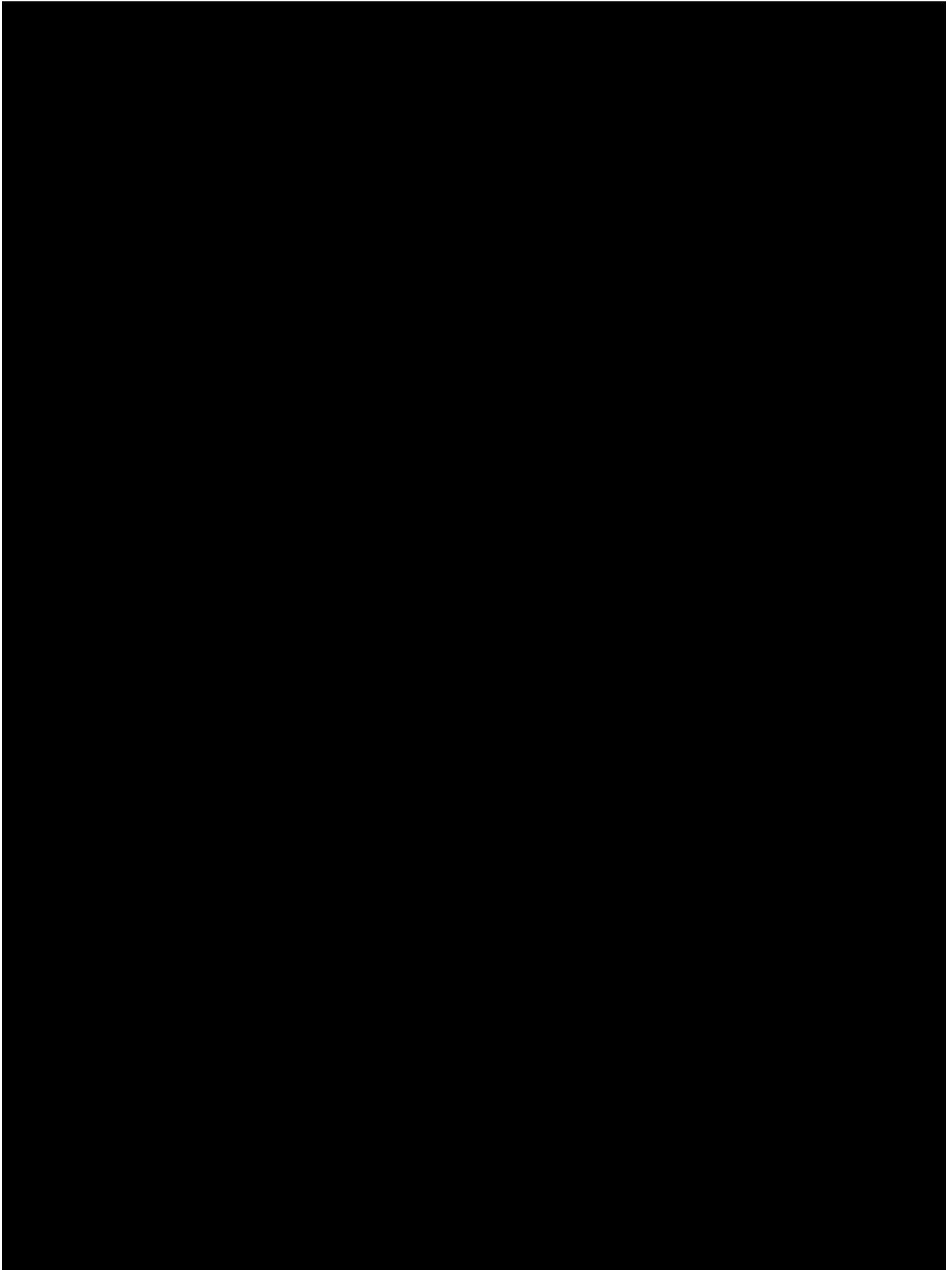
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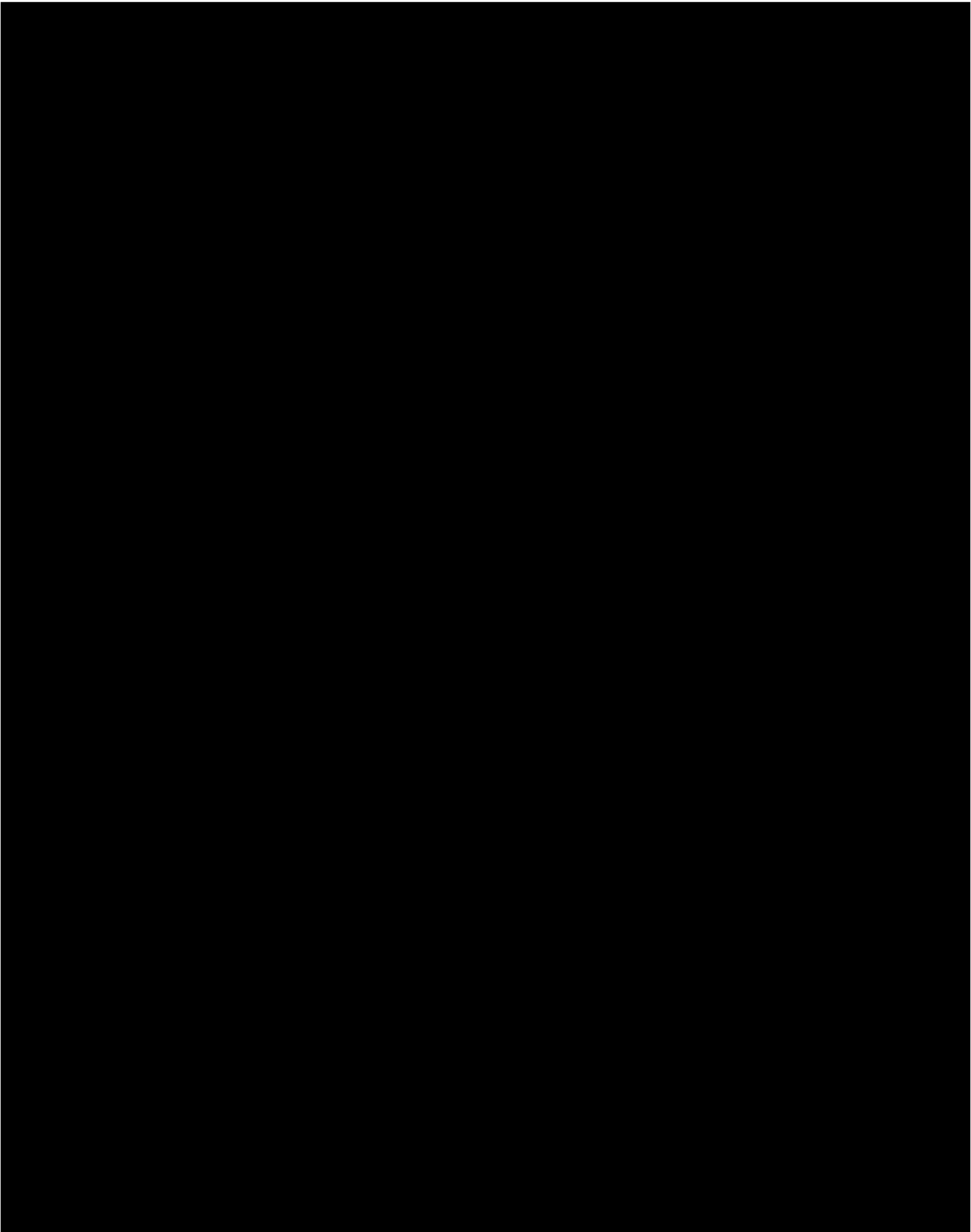
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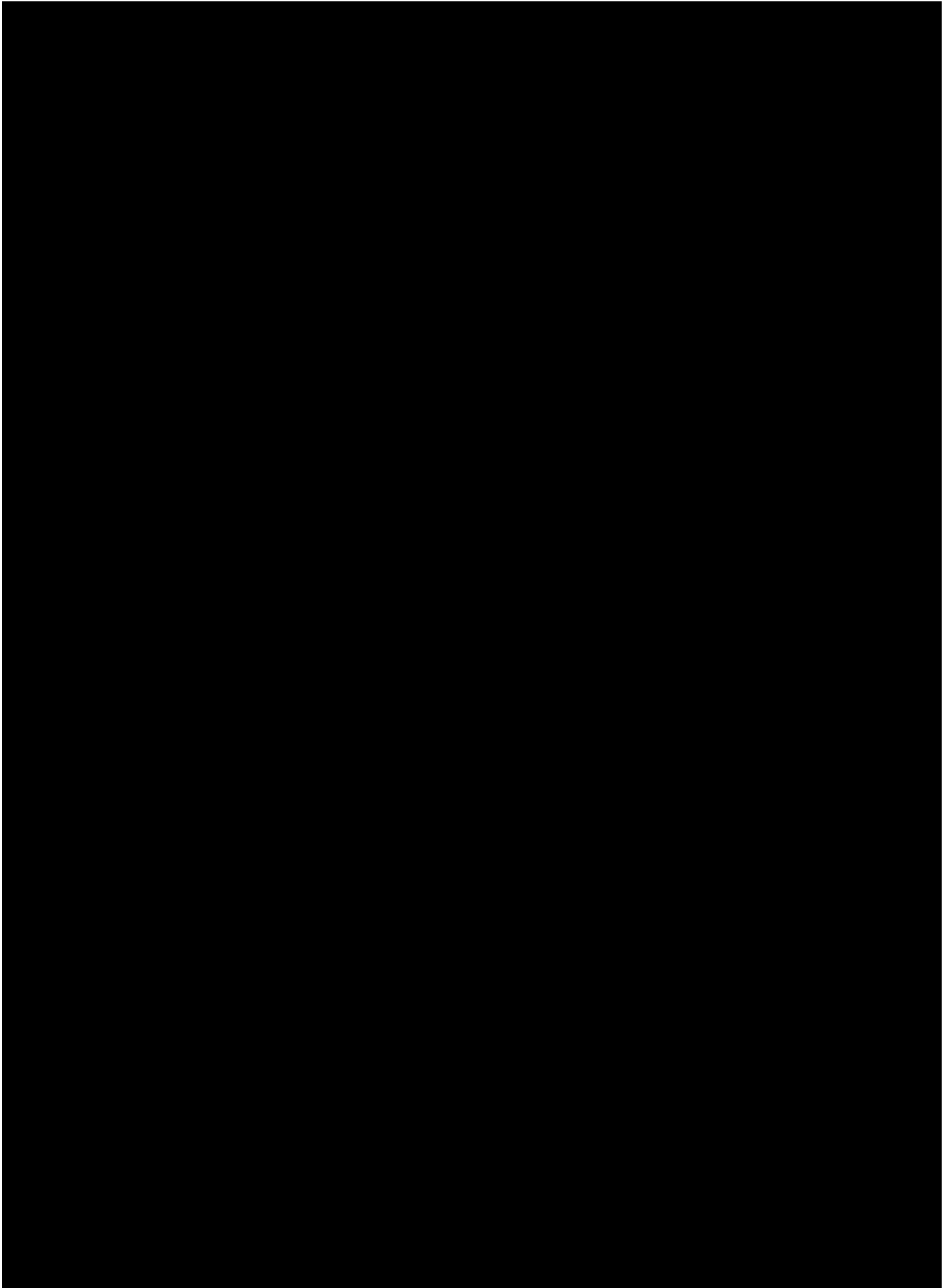


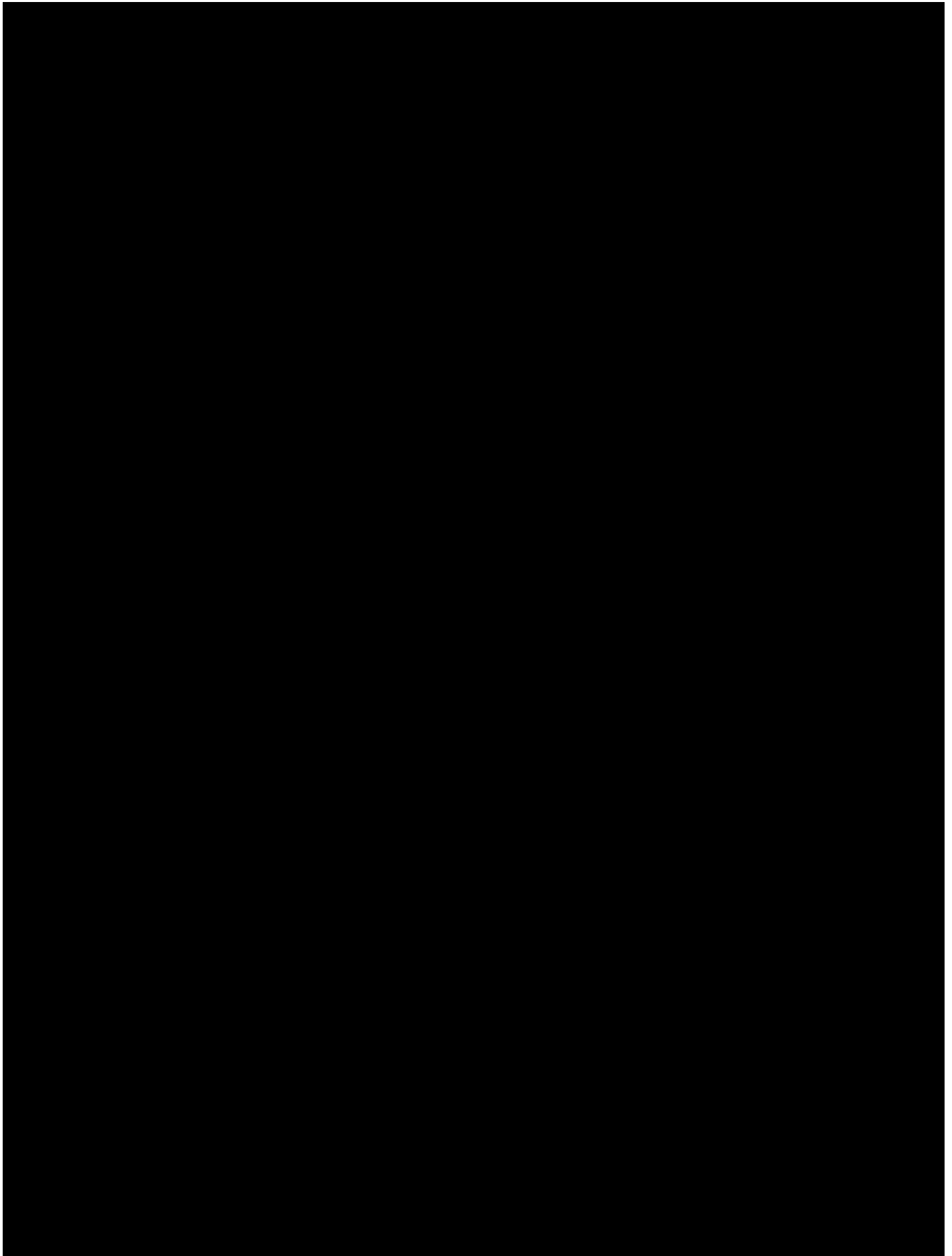


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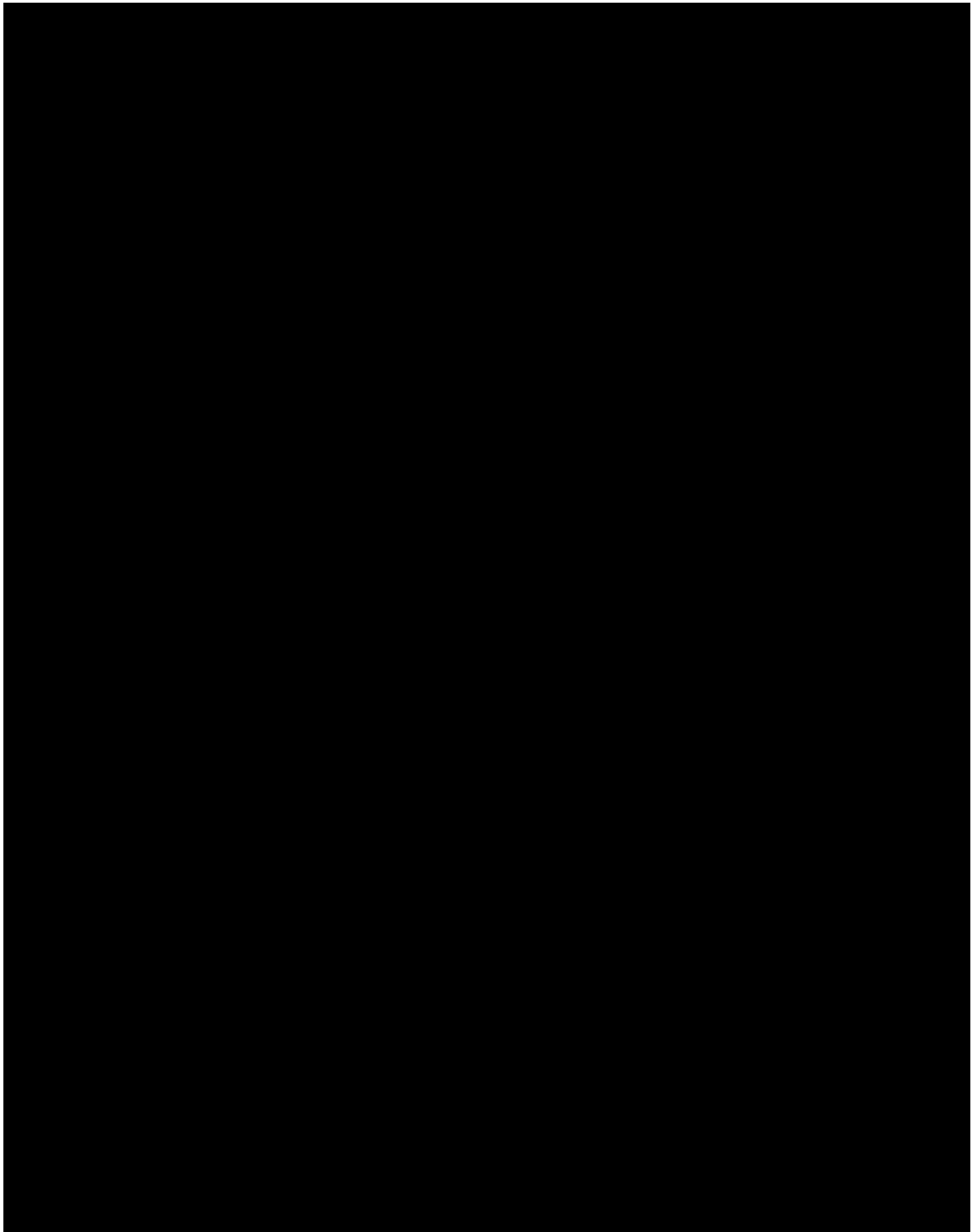


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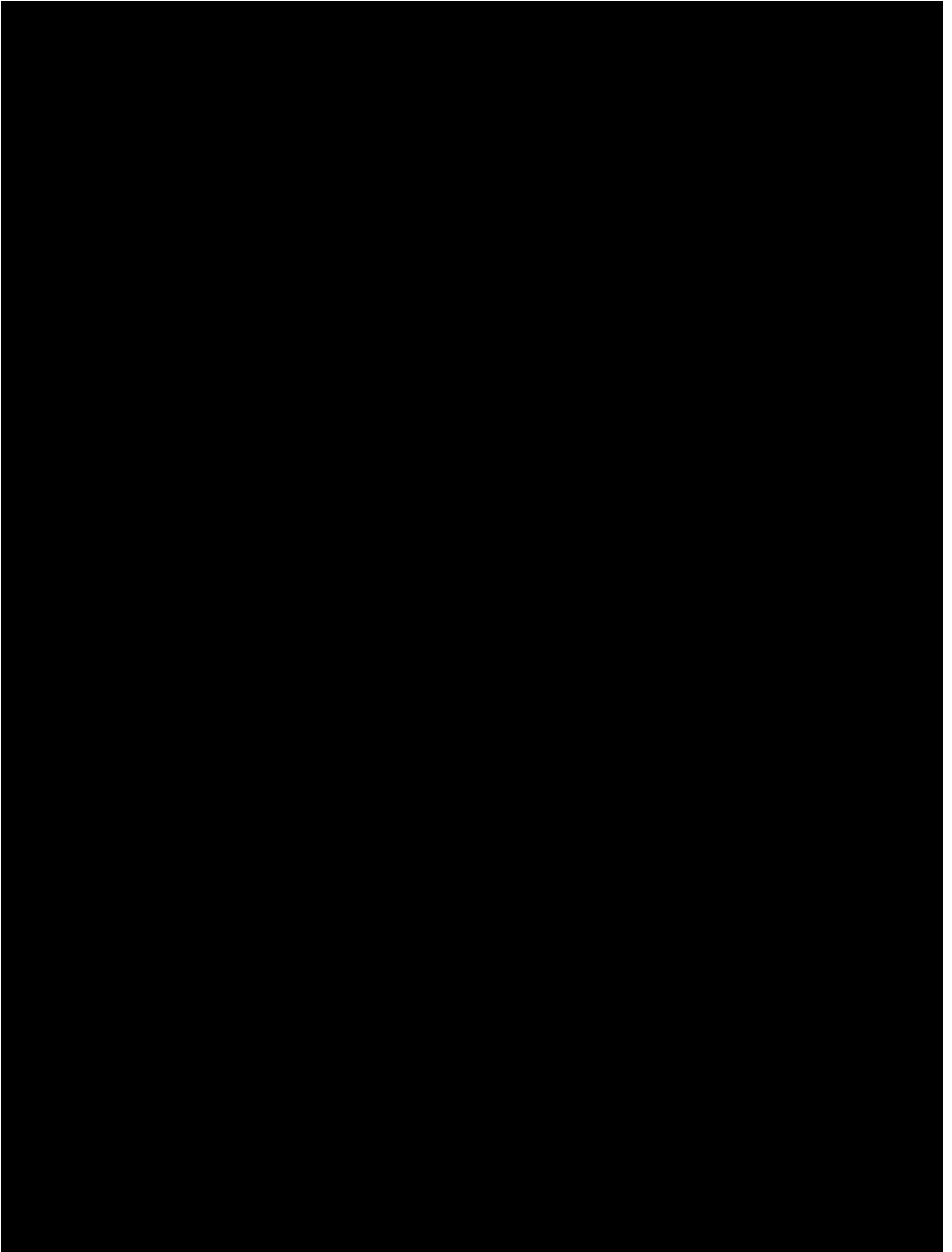




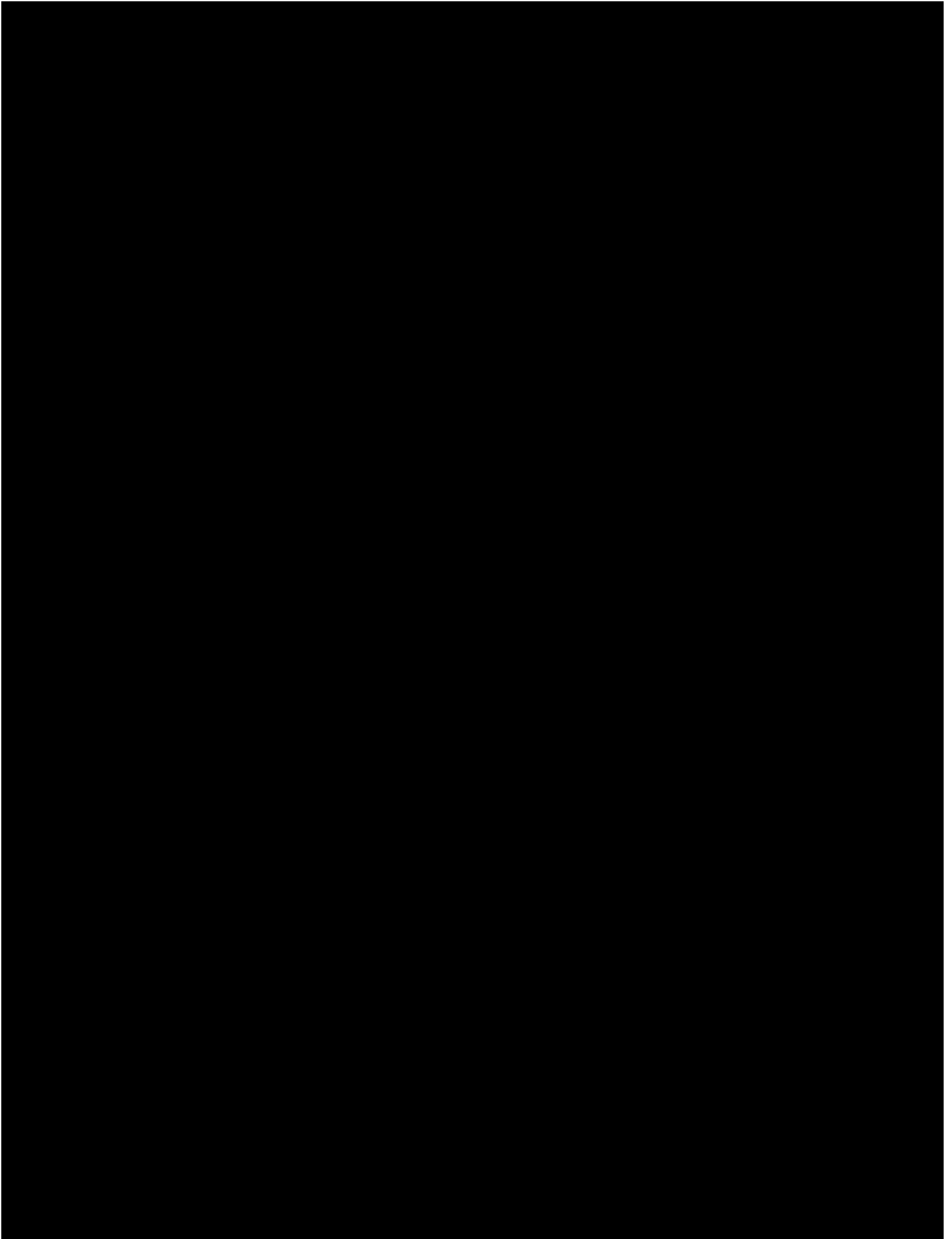
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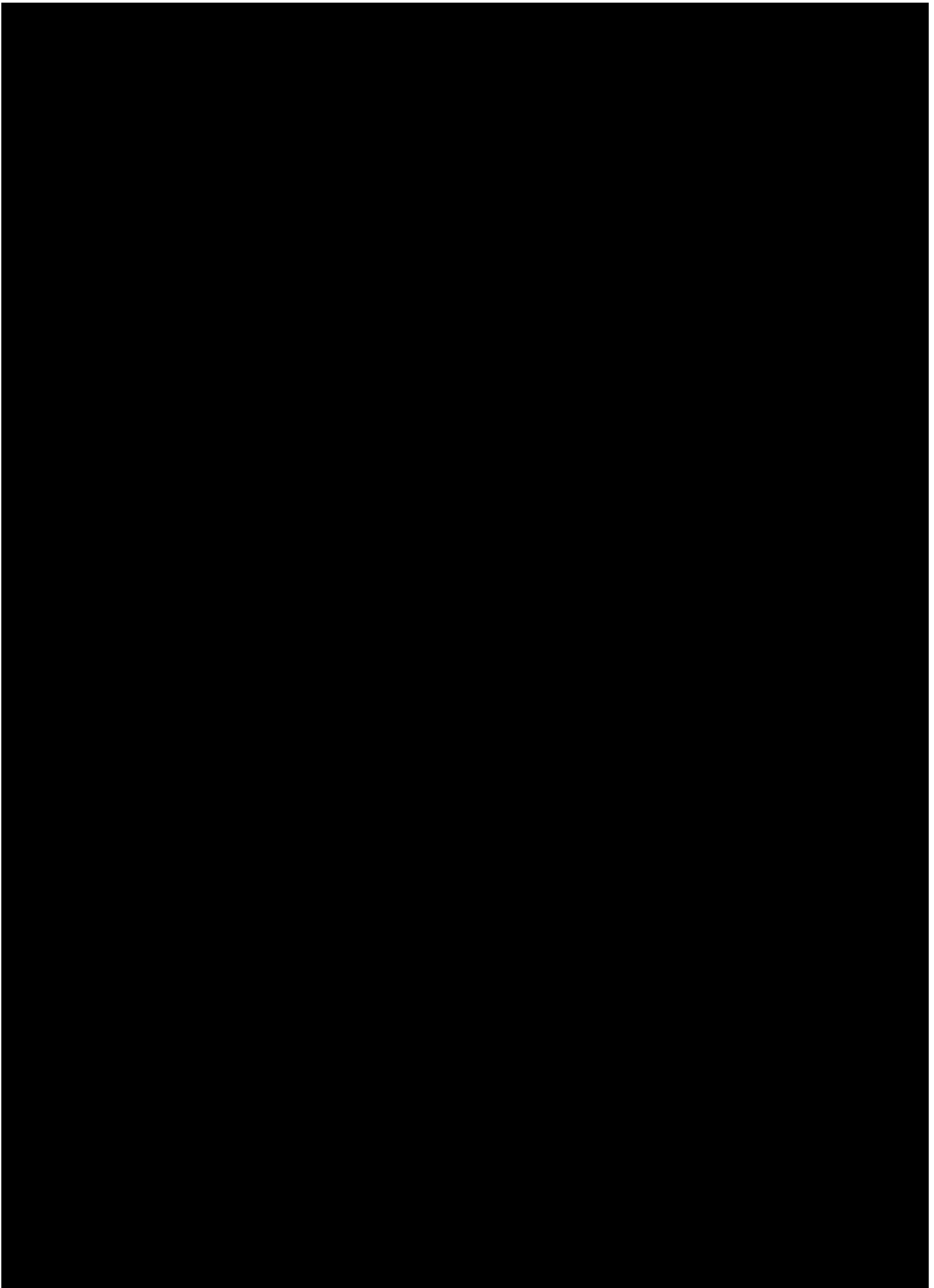


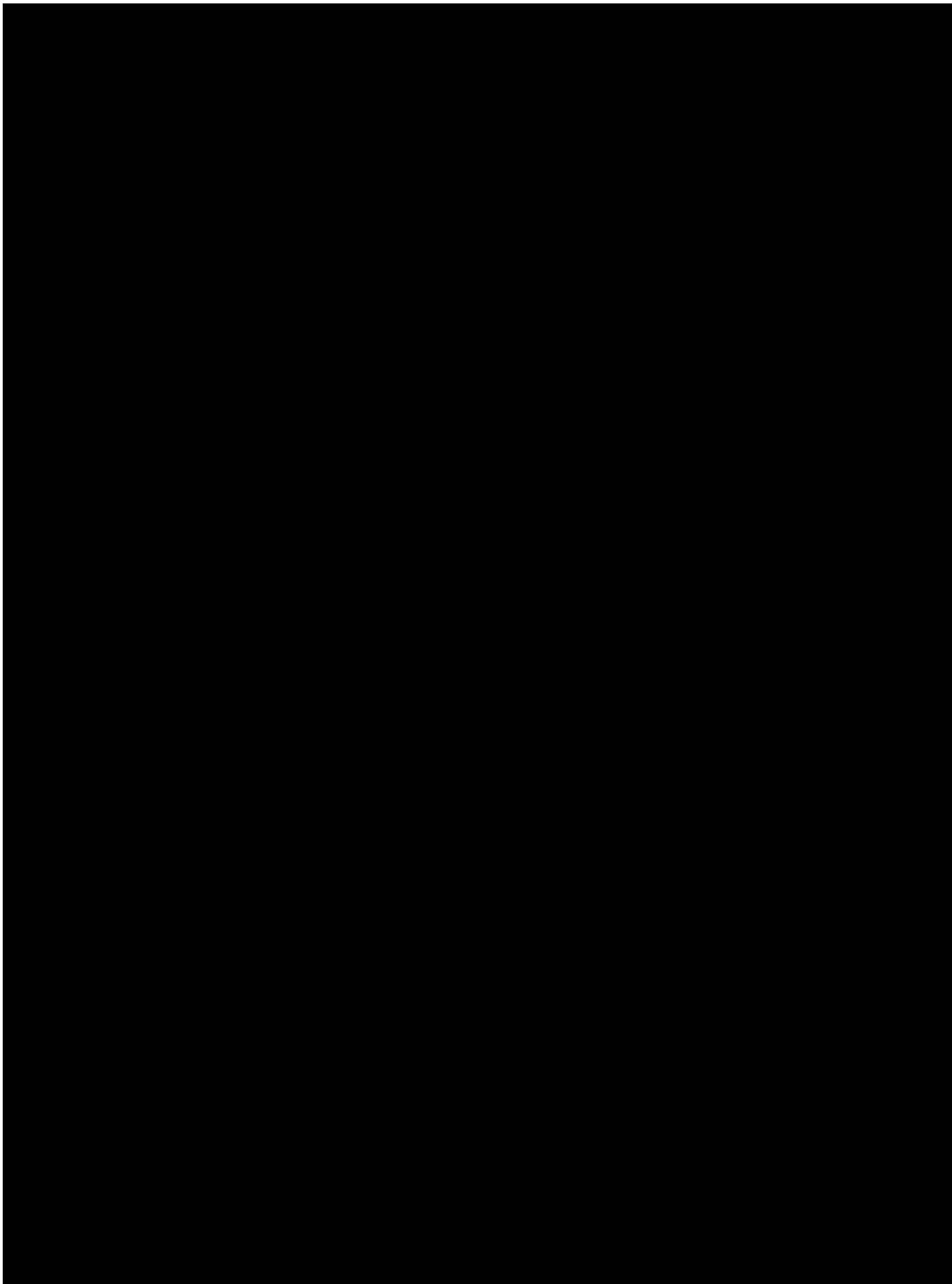
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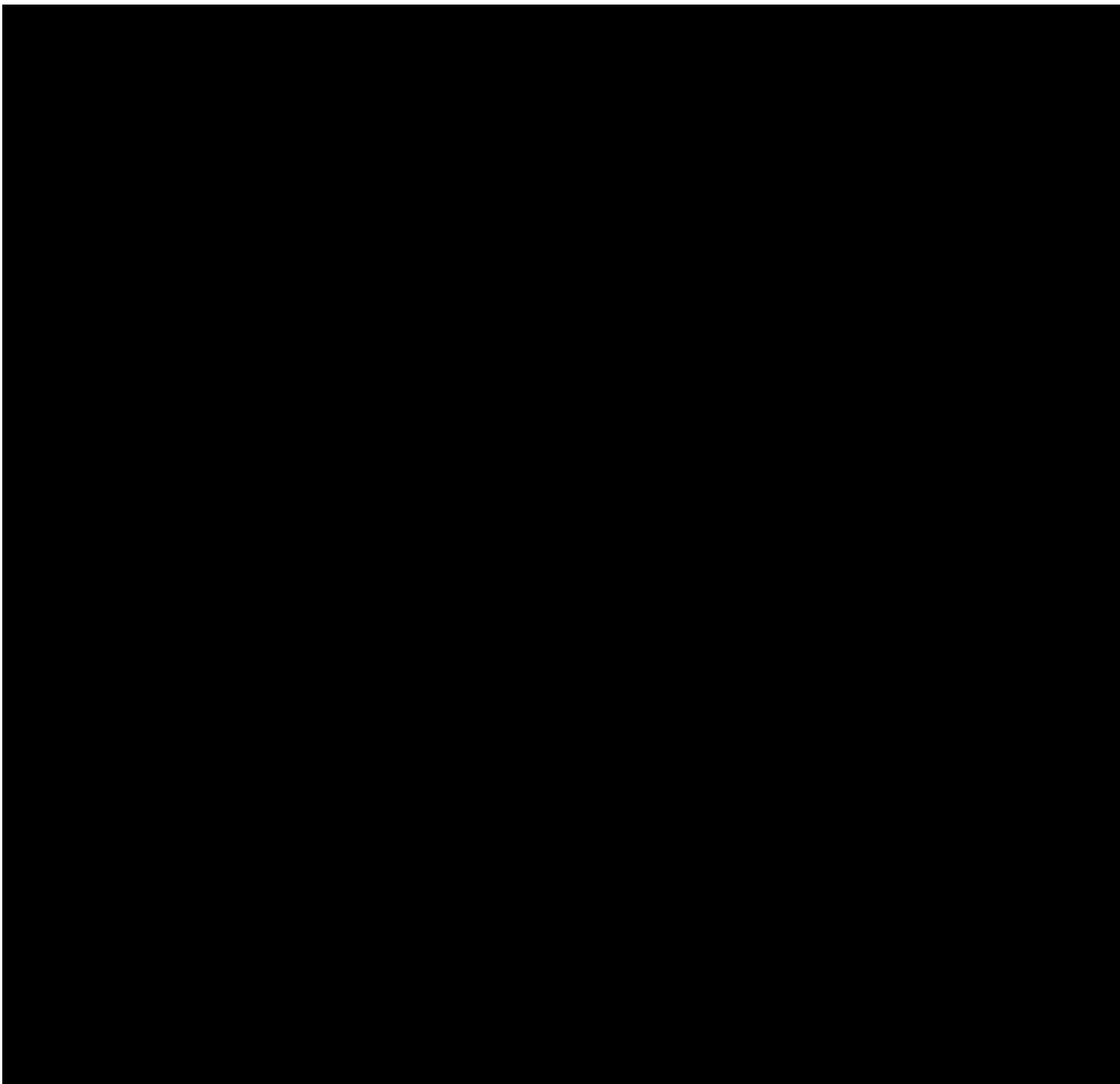




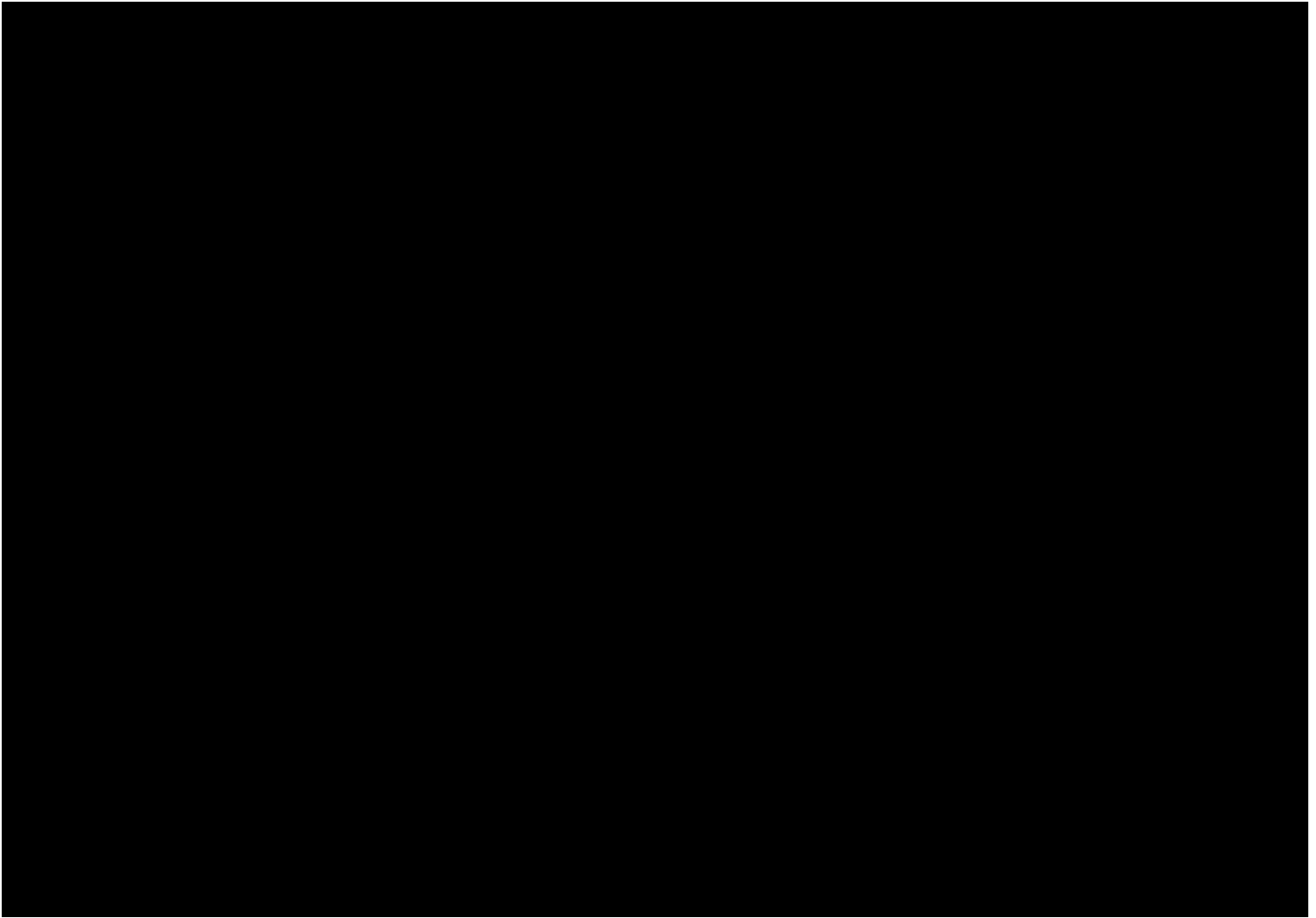


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EXHIBIT A

